

EXHIBIT E

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1 ***** C O N F I D E N T I A L *****

2 IN THE UNITED STATES DISTRICT COURT

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 - - -

5 EASTERN PROFIT CORPORATION,)
6 LIMITED,)
7 Plaintiff/Counterclaim Defendant,)
8 v.) Case No.
9 STRATEGIC VISION US, LLC,) 18-cv-2185
10 Defendant/Counterclaim Plaintiff.) (JGK)
11 -----
12

13 DEPOSITION OF

14 LIANCHAO HAN

15 WASHINGTON, D.C.

16 AUGUST 28, 2019

17

18 ATKINSON-BAKER, INC.
19 (800) 288-3376
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21 REPORTED BY: CATHERINE B. CRUMP
22 FILE NO. AD07997

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1 IN THE UNITED STATES DISTRICT COURT
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 4 EASTERN PROFIT CORPORATION,)
 5 LIMITED,)
 6) Plaintiff/Counterclaim Defendant,)
 7 v.) Case No.
 8) 18-cv-2185
 9 STRATEGIC VISION US, LLC,) (JGK)
 10)
 11 Defendant/Counterclaim Plaintiff.)
 12 -----
 13
 14 Video deposition of LIANCHAO HAN, taken on behalf
 15 of Defendant/Counterclaim Plaintiff, at the law
 16 offices of Foley & Lardner, LLP, 3000 K Street, N.W.,
 17 Suite 600, Washington, D.C., commencing at 9:18 a.m.,
 18 Wednesday, August 28, 2019, before Catherine B.
 19 Crump, a Notary Public in and for the District of
 20 Columbia.
 21
 22

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 16 5 - Certified Translation: "A Proposal for a
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1 A P P E A R A N C E S:
 2 FOR DEFENDANT/COUNTERCLAIM PLAINTIFF:
 3 GRAVES, GARRETT, LLC
 4 BY: EDWARD D. GREIM, ESQ.
 5 1100 Main Street, Suite 2700
 6 Kansas City, Missouri 64105
 7 (816) 256-3181
 8 edgreim@gravesgarrett.com
 9
 10 ALSO PRESENT:
 11 FRENCH WALLOP
 12 MICHAEL WALLER
 13 FOR PLAINTIFF/COUNTERCLAIM DEFENDANT:
 14 ZEICHNER, ELLMAN & KRAUSE, LLP
 15 BY: ZACHARY GRENDI, ESQ.
 16 1 Landmark Square
 17 Fourth Floor
 18 Stamford, Connecticut 06901
 19 zgrendi@zeklaw.com
 20
 21 ALSO PRESENT:
 22 DANIEL PODHASKIE
 23 YVETTE WANG
 24 FOR THE WITNESS:
 25 SCHULMAN, BHATTACHARYA
 26 BY: JEFFREY S. GAVENMAN, ESQ.
 27 The Clark Building
 28 7500 Old Georgetown Road
 29 Suite 901
 30 Bethesda, Maryland 20814
 31 (240) 356-8553
 32 jgavenman@schulmanbh.com
 33
 34 VIDEOGRAPHER: Steven Jones

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Lianchao Han - Confidential
 August 28, 2019

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<p>1 P R O C E E D I N G S</p> <p>2 VIDEOGRAPHER: Good morning. I am Steven</p> <p>3 Jones, your videographer and I represent 09:15</p> <p>4 Atkinson-Baker, Inc. in Glendale, California. I'm 09:15</p> <p>5 not financially interested in this action, nor am I a 09:16</p> <p>6 relative or employee of any attorney or any of the 09:16</p> <p>7 parties. 09:16</p> <p>8 Today's date is Wednesday, August 28, 2019. 09:16</p> <p>9 The time is now 9:18 a.m. This deposition is taking 09:16</p> <p>10 place at 3000 K Street, Northwest, Washington, D.C., 09:16</p> <p>11 Suite 600, 20007. 09:16</p> <p>12 This is Case No. 18-CV-2185 entitled "Eastern 09:16</p> <p>13 Profit v. Strategic Vision. The defendant is Lianchao 09:16</p> <p>14 Han. Our court reporter today is Cathy Crump, also 09:16</p> <p>15 representing Atkinson-Baker. 09:16</p> <p>16 Will counsel please introduce themselves for 09:16</p> <p>17 the record, beginning with the attorney giving 09:16</p> <p>18 notice. 09:16</p> <p>19 MR. GREIM: This is Eddie Greim, Graves, 09:16</p> <p>20 Garrett, LLC, for the plaintiff, Strategic Vision. 09:16</p> <p>21 MR. GRENDI: Zach Grendi of Zeichner, Ellman 09:16</p> <p>22 & Krause for Eastern Profit Corporation, Limited, 09:16</p>	<p>1 BY MR. GREIM: 09:17</p> <p>2 Q. Mr. Han, good morning. 09:17</p> <p>3 A. Good morning. 09:17</p> <p>4 Q. A couple of preliminary questions for 09:17</p> <p>5 you here: First of all, you, yourself, are an 09:17</p> <p>6 attorney; is that right? 09:17</p> <p>7 A. Correct. 09:17</p> <p>8 Q. Have you taken a deposition before? 09:17</p> <p>9 A. This is my first. 09:17</p> <p>10 Q. Okay. Have you been deposed before? 09:17</p> <p>11 A. This is my first. 09:18</p> <p>12 Q. I see. Well, I'll just tell I'll be 09:18</p> <p>13 asking you a series of questions. If my question is 09:18</p> <p>14 unclear or you don't understand something about it, 09:18</p> <p>15 please do let me know that and then I'll try to 09:18</p> <p>16 rephrase it. Okay? 09:18</p> <p>17 A. I will. Thank you. 09:18</p> <p>18 Q. And, also, your attorney may object from 09:18</p> <p>19 time to time on matters of form. You can still 09:18</p> <p>20 answer the question if he does that. I may rephrase 09:18</p> <p>21 it if I think he's got a point so that the testimony 09:18</p> <p>22 is clearer. 09:18</p>
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<p>1 which is the plaintiff in this action. I think you 09:16</p> <p>2 mean defendant/counterclaim plaintiff. 09:17</p> <p>3 MR. GREIM: Oh, sorry. 09:17</p> <p>4 MR. GRENDI: That's all right, Eddie. 09:17</p> <p>5 MR. GREIM: Yeah. I feel like the plaintiff. 09:17</p> <p>6 MR. GAVENMAN: Jeff Gavenman of the firm 09:17</p> <p>7 Schulman, Bhattacharya. I'm representing Mr. Han 09:17</p> <p>8 here today. 09:17</p> <p>9 MR. GREIM: Also with us are French Wallop 09:17</p> <p>10 and Mike Waller on behalf of Strategic Vision and I 09:17</p> <p>11 see sitting at the table Yvette Wang and Mr. Daniel 09:17</p> <p>12 Podhaskie. 09:17</p> <p>13 VIDEOGRAPHER: At this time, the court 09:17</p> <p>14 reporter will swear in the witness and we can 09:17</p> <p>15 proceed. 09:17</p> <p>16 Whereupon,</p> <p>17 LIANCHAO HAN,</p> <p>18 having first been duly sworn,</p> <p>19 was examined and testified as follows:</p> <p>20</p> <p>21 EXAMINATION BY COUNSEL FOR</p> <p>22 DEFENDANT/COUNTERCLAIM PLAINTIFF</p>	<p>1 A. Sure. 09:18</p> <p>2 Q. From time to time, he'll let you know if 09:18</p> <p>3 he instructs you not to answer on matters of 09:18</p> <p>4 privilege. 09:18</p> <p>5 A. Okay. 09:18</p> <p>6 Q. Do you understand that? 09:18</p> <p>7 A. I understand. 09:18</p> <p>8 Q. Okay. Well, let me ask you before we 09:18</p> <p>9 get into the details here, could you tell us 09:18</p> <p>10 something about your life story, say, just tell us 09:18</p> <p>11 about your education. 09:18</p> <p>12 A. I was educated in both China and the 09:18</p> <p>13 United States and I went to college in China, law 09:19</p> <p>14 school in China, and I also went to law school here 09:19</p> <p>15 and did my Ph.D. here and another master's degree. 09:19</p> <p>16 So that's it. 09:19</p> <p>17 Q. Okay. When did you come to the United 09:19</p> <p>18 States? 09:19</p> <p>19 A. I came here around 1988. '88. 09:19</p> <p>20 Q. Okay. And did you end up becoming a 09:19</p> <p>21 citizen? 09:19</p> <p>22 A. Yes. 09:19</p>

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<p>1 Q. After you came to the U.S., maybe if you 09:19</p> <p>2 just could walk us through your career since you've 09:19</p> <p>3 been here.</p> <p>4 A. I went to a year of law school and I 09:19</p> <p>5 didn't quite -- I finished a program, but when the 09:19</p> <p>6 Tieneman Square massacre occurred and I became a 09:19</p> <p>7 student leader in this country, we organized protests 09:20</p> <p>8 against China's crackdown, and about 300 universities 09:20</p> <p>9 in this country, the Chinese student scholars formed 09:20</p> <p>10 a group that elected me as their first vice 09:20</p> <p>11 president. So we carried out the pro-democracy 09:20</p> <p>12 protest of, you know, Chinese students in this 09:20</p> <p>13 country and, also, we prepared ourself for to 09:20</p> <p>14 practice democracy and to learn how democracy works 09:20</p> <p>15 here and, meanwhile, we lobby U.S. Congress, U.S. 09:20</p> <p>16 Government, for a tougher human rights policy against 09:20</p> <p>17 China.</p>	<p>1 that you are a speaker and writer about U.S.-Chinese 09:23</p> <p>2 relations?</p> <p>3 A. Correct.</p> <p>4 Q. And you follow domestic politics in 09:23</p> <p>5 China as well?</p> <p>6 A. Correct.</p> <p>7 Q. If I were to ask you what Chairman -- 09:23</p> <p>8 well, let me back up for a second.</p> <p>9 Who is the president of China?</p> <p>10 A. Xi Jinping.</p> <p>11 Q. Is he also the chairman of the Chinese 09:23</p> <p>12 Communist Party?</p> <p>13 A. Yes.</p> <p>14 Q. Have you heard of a program of his 09:23</p> <p>15 called China Dream?</p> <p>16 A. Yes.</p> <p>17 Q. What is that?</p> <p>18 A. It is his idea. It's rhetoric about 09:23</p> <p>19 rejuvenating the nationalism of China. That's 09:23</p> <p>20 basically what it is.</p> <p>21 Q. Okay. And what does rejuvenating of the 09:23</p> <p>22 nationalism of China entail, more specifically?</p>
<p>Page 10</p>	<p>Page 12</p>
<p>1 that, I went back to finish my Ph.D., and after 09:21</p> <p>2 Ph.D., I went back to community college to study 09:21</p> <p>3 science and went to John Hopkins to get another 09:21</p> <p>4 master's degree in biotechnology, and when Liu 09:21</p> <p>5 Xiaobo, we promoted Liu Xiaobo to get the Nobel Peace 09:21</p> <p>6 Prize, and after that, I feel that we want to 09:21</p> <p>7 organize to run Liu Xiaobo.</p> <p>8 So I joined a human rights group called 09:22</p> <p>9 Citizens for Initiative for China and I served as the 09:22</p> <p>10 vice president of the group until now. I'm still the 09:22</p> <p>11 vice president of the group. So we basically lobby 09:22</p> <p>12 Congress, educate American general public about China 09:22</p> <p>13 and about, you know, for improved democracy for human 09:22</p> <p>14 rights.</p> <p>15 Q. Now, is it true -- I mentioned earlier 09:22</p> <p>16 that you're an attorney. You're a patent attorney; 09:22</p> <p>17 is that right?</p> <p>18 A. Correct.</p> <p>19 Q. Do you have any patents?</p> <p>20 A. I didn't myself. I didn't get a chance</p> <p>21 to file.</p> <p>22 Q. Okay. Okay. Is it also fair to say</p>	<p>1 A. More specifically --</p> <p>2 MR. GAVENMAN: Objection to form.</p> <p>3 THE WITNESS: Huh?</p> <p>4 MR. GAVENMAN: I said objection to form.</p> <p>5 THE WITNESS: It's, basically, you know, make</p> <p>6 China the greatest country in the world.</p> <p>7 BY MR. GREIM:</p> <p>8 Q. Does that entail competition with the 09:24</p> <p>9 United States?</p> <p>10 A. Absolutely.</p> <p>11 Q. Does it involve undermining United 09:24</p> <p>12 States' interests?</p> <p>13 A. Of course.</p> <p>14 Q. Now, I take it, based on the background 09:24</p> <p>15 that you've just given us, that one of your goals is 09:24</p> <p>16 not to advance President Xi's goals. Am I right 09:24</p> <p>17 about that?</p> <p>18 MR. GRENDI: Object to the form.</p> <p>19 THE WITNESS: Yes.</p> <p>20 MR. GREIM: Okay. Brief interlude: I want</p> <p>21 to mark as Exhibit 1 a production I received from</p> <p>22 your counsel in the wee hours.</p>
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<p>1 [Han Exhibit No. 1 was 09:25 2 marked for identification.] 09:25 3 BY MR. GREIM: 09:25 4 Q. I'll show you what's been marked as Han 09:25 5 Exhibit 1, and you'll see it starts off with a letter 09:25 6 from your attorney, Mr. Gavenman, that takes up the 09:25 7 first two pages and then there are a total of four 09:25 8 Bates-labeled pages. Do you see that? 09:25 9 A. Yeah. 09:25 10 Q. Are those four pages the documents that 09:25 11 you gave to your attorney to produce to me? 09:25 12 A. Yes. 09:25 13 Q. And the redaction, I take it, is just 09:25 14 your communication with your counsel about what is 09:26 15 below; is that right? 09:26 16 A. Yes. 09:26 17 Q. Okay. Now, this morning, you also 09:26 18 produced a folder of hard copy documents; is that 09:26 19 right? 09:26 20 A. Yes. 09:26 21 Q. Okay. We are looking at those and we'll 09:26 22 cover those later after we have a chance for a break. 09:26 </p>	<p>1 A. No. 09:27 2 Q. No. Why did you set your -- 09:27 3 A. I was searching for all the text 09:27 4 messages and I noticed my Signal with Mike and French 09:27 5 is not set correctly. Sometimes, you know, it 09:27 6 changes. So I set it to 10 seconds. 09:27 7 Q. What was it set to before 10 seconds? 09:27 8 A. Before, I set it usually automatically 09:27 9 just erase it after read. 09:28 10 Q. Did you have any communications with Mr. 09:28 11 Guo that you did not produce? 09:28 12 A. No. With Mr. Guo, we don't use Signal. 09:28 13 Q. What do you use to communicate with Mr. 09:28 14 Guo? 09:28 15 A. With What's App. WhatsApp, I also 09:28 16 automatically to delete it whenever I read the 09:28 17 message. Can I add? 09:28 18 MR. GAVENMAN: Sure. 09:28 19 BY MR. GREIM: 09:29 20 Q. Sure. 09:29 21 A. For this particular project, at the very 09:29 22 beginning, we all agreed we're not -- everything has 09:29 </p>
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<p>1 Okay? 09:26 2 A. Okay. 09:26 3 Q. I want to ask you do you have -- I have 09:26 4 mentioned to your counsel the other day that I 09:26 5 thought you may have text messages. Did you search 09:26 6 for and find any text messages or Signal messages 09:26 7 with either Ms. Wallop or Mr. Waller? 09:26 8 A. All the messages are deleted. It said 09:26 9 automatically deleted. I don't have any. 09:26 10 Q. Now, I will represent to you that when 09:26 11 you use Signal and you change the settings on 09:27 12 there -- 09:27 13 A. Correct. 09:27 14 Q. -- it tells everybody else your 09:27 15 contacts. 09:27 16 A. Yes. 09:27 17 Q. And so, yesterday, I believe we saw a 09:27 18 notice that you had changed the settings to 10-second 09:27 19 delete. Now, is that correct? Did you do that? 09:27 20 A. That's correct. 09:27 21 Q. But your testimony -- well, let me ask 09:27 22 you. That's not what deleted the messages, is it? 09:27 </p>	<p>1 to be in person, face-to-face meeting, no digital 09:29 2 transmission of any sort of documents. 09:29 3 Q. And why was that? 09:29 4 A. Because everybody agreed to keep secret. 09:29 5 So we don't communicate on the digital platform 09:29 6 whatsoever. 09:29 7 Q. However, do you recall that, in fact, 09:29 8 some text communications did occur between you and 09:29 9 Ms. Wallop and Mr. Waller? 09:29 10 A. I don't remember. 09:29 11 Q. Okay. 09:29 12 A. If there is, it must be very vague. I 09:29 13 don't think we discussed that directly. 09:29 14 Q. Specifically, have you had 09:30 15 communications with Ms. -- well, let me back up. 09:30 16 Have you had communications with Mr. Guo about 09:30 17 this case? 09:30 18 A. Let me think about this. 09:30 19 He called me on WhatsApp, blamed Mike and 09:30 20 French as a fraud, cheated him, and there was one 09:30 21 situation, one time, that his supporters started 09:30 22 about getting ready to attack me personally because I 09:31 </p>

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<p>1 introduced Mike and French to Miles. Miles feel like 09:31 2 he is cheated by them. So when I learned the 09:31 3 supporters are about to attack me personally, I sent 09:31 4 him a message and I said how can you, you know, let 09:31 5 your supporters do this to me. 09:31</p> <p>6 So he called me back and discussed and we 09:31 7 argued, you know, for quite a while and then, you 09:31 8 know, just ended that. He kept asking me who gave 09:31 9 you that information, who tell you that my supporters 09:31 10 are going to attack you personally. I said I won't 09:31 11 be able to tell you that, and he pressured me many, 09:32 12 many times. I refused to tell him. 09:32</p> <p>13 So when it ended, that's the only time we 09:32 14 discussed this, and a few times when I was in his 09:32 15 office, he mentioned about it as well, but we 09:32 16 obviously have different views about our perception. 09:32</p> <p>17 Q. The longer discussion that you just 09:32 18 testified to -- 09:32</p> <p>19 A. Yeah. 09:32</p> <p>20 Q. -- was this after the lawsuit was filed? 09:32</p> <p>21 A. I don't know when this lawsuit was 09:32 22 filed. So I have no idea if it was before or after. 09:32</p>	<p>1 platform. 09:34</p> <p>2 Q. Have you received any sort of threats 09:34 3 from Yvette Wang or Mr. Podhaskie, sitting here today 09:35 4 on behalf of Golden Spring? 09:35</p> <p>5 A. No. 09:35</p> <p>6 MR. GRENDI: Objection to form. 09:35</p> <p>7 BY MR. GREIM: 09:35</p> <p>8 Q. Let me ask you have you had any 09:35 9 communications with Mr. Podhaskie here before today? 09:35</p> <p>10 A. I did. 09:35</p> <p>11 Q. What were those communications? 09:35</p> <p>12 A. Mostly focused on the case against Clark 09:35 13 Hill. He asked me -- he's bothering me, actually, 09:35 14 about, you know, the case and I have been giving my 09:35 15 accounts five, six times to different lawyers. I 09:36 16 just got really tired of that. He pressured me for 09:36 17 giving more. So that's why we were back and forth 09:36 18 about it. 09:36</p> <p>19 Q. I'm sorry. What was the Clark Hill 09:36 20 case? 09:36</p> <p>21 A. Clark Hill case is Miles is suing them, 09:36 22 is about maybe suing them for his political asylum, 09:36</p>
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<p>1 Q. Okay. Was it after the -- do you 09:32 2 recall, at some point, there was a letter terminating 09:32 3 the contract from the Foley, Hogue law firm? 09:32</p> <p>4 A. I didn't. 09:32</p> <p>5 Q. No? Do you recall if it was soon after 09:32 6 the work on the project started -- stopped? 09:33</p> <p>7 A. That, I don't specifically remember. I 09:33 8 think it must be a while after it stopped. 09:33</p> <p>9 Q. Did Mr. Guo deny to you that he had 09:33 10 supporters who were going to attack you? 09:33</p> <p>11 A. He didn't deny it. 09:33</p> <p>12 Q. What do you mean when you say that 09:33 13 supporters of Guo were going to personally attack 09:33 14 you? 09:33</p> <p>15 A. At one point, I think Miles made a video 09:33 16 to see. I assured him four times a hundred percent 09:34 17 Mike and French are going to deliver what he's asking 09:34 18 for, which I did, and then the supporters say, you 09:34 19 know, I must be in the scam to cheat him, so asking 09:34 20 him when should we attack Lianchao Han. 09:34</p> <p>21 Q. Were these supporters online supporters? 09:34</p> <p>22 A. I think they were through a private chat 09:34</p>	<p>1 and Clark Hill was representing him originally to do 09:36 2 the political asylum case and then right after, you 09:36 3 know, they file the application, the Chinese cyber 09:36 4 attacked, basically hijacked the entire firm and 09:36 5 forced the Clark Hill to drop representation of him. 09:36</p> <p>6 As a result, Miles' application was exposed 09:37 7 because Chinese hackers got the information and 09:37 8 posted online, which is damaging to his personal 09:37 9 safety. 09:37</p> <p>10 Q. Now let me ask you when were your 09:37 11 interactions with Mr. Podhaskie about that matter? 09:37</p> <p>12 A. I would say I don't know when he was 09:37 13 hired. I think it's back and forth probably through 09:37 14 maybe over half a year, maybe eight months. I don't 09:37 15 remember specifically. 09:37</p> <p>16 Q. Half a year or eight months ago? 09:37</p> <p>17 A. Yes. Eight months ago, maybe a year 09:37 18 ago. 09:37</p> <p>19 Q. And we're about to move on. I just want 09:37 20 to make sure I understand this. 09:38</p> <p>21 A. Yeah. 09:38</p> <p>22 Q. How is it that you would have 09:38</p>

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<p>1 information about the Clark Hill matter? What was 09:38 2 your involvement? 09:38 3 A. I was helping Miles for his asylum case. 09:38 4 Q. So then you had interaction with the 09:38 5 Clark Hill lawyers? 09:38 6 A. Correct. 09:38 7 Q. How do you know that Chinese hackers did 09:38 8 hack the Clark Hill law firm? 09:38 9 A. Clark Hill told me. 09:38 10 Q. Do you believe them? 09:38 11 A. Of course. 09:38 12 Q. Okay. Let me ask about -- you mentioned 09:38 13 a couple of different conversations with Mr. Guo 09:39 14 about this case. 09:39 15 A. Yes. 09:39 16 Q. We talked about the longer conversation 09:39 17 and then you said you met with him a few more times 09:39 18 in the office. 09:39 19 A. Yes. 09:39 20 Q. Now, whose office was that? 09:39 21 A. Miles' office. 09:39 22 Q. Where is that office? 09:39 </p>	<p>1 colleagues that agree with me, we try to persuade him 09:40 2 not to pursue it, and that was the earliest 09:40 3 discussion. Of course, he won't listen to me and I 09:40 4 tried a few more times this, and then I don't think 09:41 5 he was -- you know, there's no way he agreed with me. 09:41 6 So that was that. 09:41 7 Then, later, I think we discussed. He didn't 09:41 8 discuss specifically about the case at all. He kept 09:41 9 saying French and Mike are frauds, cheated him, which 09:41 10 we always have a different view on that. I disagree 09:41 11 with him on that. So we argued back and forth. So 09:41 12 that pretty much was our main conversation about the 09:41 13 case, whether they're cheating him or not. 09:41 14 Q. Why do you disagree? 09:41 15 A. Because I think everybody comes in with 09:41 16 a good intention at the beginning. 09:42 17 Q. Who are the colleagues of Mr. Guo's that 09:42 18 agreed with your position early on? 09:42 19 MR. GAVENMAN: Objection to form. 09:42 20 Go ahead. 09:42 21 THE WITNESS: At the meeting was his -- 09:42 22 Victor Cedar and William Yu. Williams, he's a 09:42 </p>
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<p>1 A. I think at -- what is that? 62 -- 64 09:39 2 Street of New York. 09:39 3 Q. 64th Street on the upper east side? 09:39 4 A. Yeah. 09:39 5 Q. Are those also the Golden Spring 09:39 6 offices? 09:39 7 A. That, I don't know. 09:39 8 Q. When did those meetings occur, to the 09:39 9 best of your recollection? 09:39 10 A. That's hard to know. I think maybe two 09:39 11 months ago, there was one, or three months ago and 09:39 12 then early -- I have been there maybe three, four 09:40 13 times. 09:40 14 Q. Does Mr. Guo ask for your advice about 09:40 15 this case? 09:40 16 A. No. 09:40 17 Q. What did you discuss with him about the 09:40 18 case? Let's start with the earliest meeting that you 09:40 19 can remember. 09:40 20 A. I think at the beginning, I strongly 09:40 21 advised when he mentioned he's going to sue French 09:40 22 and Mike, I opposed the idea. I also got his 09:40 </p>	<p>1 manager, I think. 09:42 2 BY MR. GREIM: 09:42 3 Q. Is this William Je, J-E? 09:42 4 A. J-E? I think Yu. Right? No. 09:42 5 I don't remember his last name, but he was -- 09:42 6 he was -- I remember he was at the meeting. He also 09:43 7 agreed with me not to pursue this case, because we -- 09:43 8 yeah. I predict what's going to happen exactly like 09:43 9 what's happening right now. 09:43 10 MR. GRENDI: I'm sorry. What was the name of 09:43 11 the first individual? 09:43 12 THE WITNESS: Victor. 09:43 13 MR. GRENDI: Sorry. I was asking the court 09:43 14 reporter. I apologize. 09:43 15 MR. GREIM: That's okay. I was going to ask 09:43 16 anyway. 09:43 17 MR. GRENDI: Okay. Fair enough. 09:43 18 BY MR. GREIM: 09:43 19 Q. Victor, what was his last name? 09:43 20 A. Cedar. Cedar. Correct? 09:43 21 Q. Was he at Foley, Hogue? 09:43 22 A. No. He is a solo practitioner. 09:43 </p>

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1	Q. Could you spell his last name?	09:43	1	Vision would likely counterclaim against him?	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	Q. What did you understand that William's	09:43	4	difficult situation that will jeopardize your	09:46
5	position was with Mr. Guo?	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	Q. Did you ever speak with Yvette Wang, who	09:47
7	Q. Do you know if he is the director of a	09:44	7	is sitting here at the table, about the lawsuit?	09:47
8	company called ACA?	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	Q. Do you know what role she plays for Mr.	09:47
10	Q. Have you heard of that company, ACA or	09:44	10	Guo?	09:47
11	ACA Capital Group Limited?	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	Q. What is that?	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	Q. This William Yu --	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	Q. -- where does he live?	09:45	22	her out, put me back in.	09:48
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1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	Q. Does he have a role with McQuary Capital	09:45	3	observation.	09:48
4	Group? Does that sound familiar?	09:45	4	Q. Well, have you heard of an entity called	09:48
5	A. I don't remember. Is that Australian?	09:45	5	Golden Spring New York or Golden Spring Hong Kong?	09:48
6	Q. It is.	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	Q. When the last time you saw William?	09:45	9	Q. Do you know whether Ms. Wang has a role	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	with either of the Golden Spring entities?	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	Q. I want to go back now. I just want to	09:46	12	THE WITNESS: I didn't.	09:48
13	make sure we cover this. Is there anything else that	09:46	13	BY MR. GREIM:	09:48
14	you discussed with Mr. Guo in these meetings in his	09:46	14	Q. Why was it that Ms. Wang -- well, let me	09:48
15	office --	09:46	15	back up.	09:48
16	A. Yeah.	09:46	16	Why do you say Ms. Wang was originally	09:48
17	Q. -- about the case that we haven't	09:46	17	excluded from the discussion?	09:49
18	covered yet?	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	Q. Did you tell Mr. Guo that Strategic	09:46	22	system.	09:49

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1	Q. What do you mean, "within the system"?	09:49	1	him with his various efforts to obtain political	09:52
2	A. With the communist, work for the Chinese	09:49	2	asylum from that point forward?	09:52
3	Government. I didn't know the source, but I just	09:49	3	A. Correct.	09:52
4	didn't remember if he said that in the meeting or	09:49	4	Q. What was your initial impression of Mr.	09:52
5	later, but that's my impression.	09:49	5	Guo?	09:52
6	Q. Well, let me back up for a second. When	09:49	6	A. I think he's a genuine warm person. He	09:52
7	did you first remember meeting her?	09:49	7	has a deep knowledge of how the communist system	09:53
8	A. Meeting Yvette?	09:50	8	works and he has a reason to expose the high-ranking	09:53
9	Q. Um-hum.	09:50	9	government officials that are corrupt and, also, he	09:53
10	A. I think maybe two years ago.	09:50	10	has many defects of the people from the communist	09:53
11	Q. Okay. So it would be late summer of	09:50	11	system.	09:53
12	2017?	09:50	12	Q. What do you mean by that?	09:53
13	A. It will be August or September. August,	09:50	13	A. Like --	09:53
14	most likely, yeah, August.	09:50	14	MR. GRENDI: Objection to form.	09:53
15	Q. How are you able to remember that time?	09:50	15	THE WITNESS: He probably won't tell you	09:53
16	A. That was political asylum. Miles tried	09:50	16	exactly what he thinks. Sometimes he exaggerates	09:53
17	to -- that's why we were introduced to him and he did	09:50	17	what he's done and stuff like that.	09:53
18	help him with his political asylum. Yeah.	09:50	18	BY MR. GREIM:	09:53
19	Q. What I should have asked you in the very	09:50	19	Q. So you met Ms. Wang, then, within about	09:53
20	beginning was when did you first meet Mr. Guo?	09:50	20	a month or so of having met Mr. Guo himself?	09:54
21	A. I think it's either July or August,	09:50	21	A. Correct.	09:54
22	early August or, you know, late July of 2017.	09:50	22	Q. Did your impression of Mr. Guo change	09:54
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1	Q. And who introduced you?	09:50	1	over time?	09:54
2	A. His name is Jonathan Ho. The Chinese	09:51	2	A. No.	09:54
3	name is Chen Jun.	09:51	3	Q. Do you consider yourself to be a	09:54
4	personal friend of Mr. Guo?	09:54	4	personal friend of Mr. Guo?	09:54
5	A. Correct.	09:51	5	A. That's a very --	09:54
6	Q. Jonathan Ho. Who is Jonathan Ho?	09:51	6	Q. Sorry.	09:54
7	A. He is a longtime friend of mine. He	09:51	7	A. -- difficult question. I think I	09:54
8	also used to be an activist, pro-democracy activist.	09:51	8	maintain a personal relationship with him and, also,	09:54
9	He's a friend with the late Nobel Peace Prize winner	09:51	9	politically, I support his effort and I also have a	09:55
10	Liu Xiaobo.	09:51	10	lot of reservation about him.	09:55
11	Q. So why did Mr. Ho introduce you to Mr.	09:51	11	Q. What are those reservations?	09:55
12	Guo?	09:51	12	A. He just brings troubles to me. You	09:55
13	MR. GRENDI: Objection, form.	09:51	13	know, I live a very simple straightforward life.	09:55
14	MR. GAVENMAN: Objection to form.	09:51	14	This is my first deposition, first -- you know, this,	09:55
15	THE WITNESS: I think, at the time, they were	09:52	15	it's not fun.	09:55
16	talking about the options, what to do, whether to	09:52	16	My focus is the big picture, how to change	09:55
17	seek political asylum or other form of protection,	09:52	17	China, how to promote democracy. I don't want to	09:55
18	and he knows that, you know, I'm familiar with the	09:52	18	sign on to derail from that goal. This definitely is	09:55
19	American legal system. So he brought me to discuss	09:52	19	troublesome to me.	09:55
20	those options with Miles.	09:52	20	Q. Do you have any concern about whether	09:55
21	BY MR. GREIM:	09:52	21	Guo is fully committed to overturning the Chinese	09:56
22	Q. And is it fair to say that you assisted	09:52	22	communist system?	09:56
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<p>1 A. Well, I think he's fully committed. At 09:56 2 the same time, he also has his relatives, his 09:56 3 employees to be considered and his assets, although, 09:56 4 all of it has been confiscated. So I understand his 09:56 5 position. 09:56</p> <p>6 Q. And would it surprise you if Mr. Guo, 09:56 7 for example, vacillates in wanting regime change 09:56 8 versus something less than that? 09:56</p> <p>9 MR. GRENDI: Object to the form. 09:57 10 MR. GAVENMAN: Object to the form. 09:57 11 THE WITNESS: Can you rephrase that? 09:57 12 BY MR. GREIM: 09:57</p> <p>13 Q. Sure. Sure. Would it surprise you that 09:57 14 Mr. Guo tries to bargain with Chinese officials? 09:57</p> <p>15 MR. GRENDI: Object to the form. 09:57 16 MR. GAVENMAN: Objection to form. 09:57 17 THE WITNESS: Frankly, I think it's possible, 09:57 18 but it's unlikely, highly unlikely. It's too late 09:57 19 for that. 09:57</p> <p>20 BY MR. GREIM: 09:57</p> <p>21 Q. What do you mean by it's too late for 09:57 22 that? 09:57</p>	<p>1 MR. GRENDI: Object to the form. 09:58 2 THE WITNESS: I didn't know. 09:58 3 BY MR. GREIM: 09:58</p> <p>4 Q. Do you know whether he is negotiating 09:58 5 with Chinese officials even today? 09:59</p> <p>6 A. I didn't know that either. 09:59 7 Q. Let's shift gears for a moment here and 09:59 8 -- well, before we move on. After you met Guo, Mr. 09:59 9 Guo -- 09:59</p> <p>10 A. Yeah. 09:59</p> <p>11 Q. -- did he introduce you to others 09:59 12 besides Yvette Wang over the next month or two? 09:59</p> <p>13 A. I met all his families, family members, 09:59 14 through him. I met with Tony Blair. I met -- who 09:59 15 else? There were several other people that's 09:59 16 significant maybe. 09:59</p> <p>17 Q. Did he introduce you to someone named 10:00 18 Hansheng Wang? 10:00</p> <p>19 A. He never introduced me to Hansheng Wang. 10:00 20 Hansheng Wang, I know used to be his staff. I got to 10:00 21 know him in that capacity. 10:00</p> <p>22 Q. What does Hansheng Wang do for Mr. Guo? 10:00</p>
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1	A. I met his son, Wu Chun. I met his	10:01	1	Guo?	10:04
2	daughter, Wo Mei, his wife, Yu Chen Su.	10:01	2	MR. GRENDI: Object to the form.	10:04
3	Q. We'll get some of these names here on	10:01	3	THE WITNESS: I didn't approach them.	10:04
4	the break.	10:01	4	BY MR. GREIM:	10:04
5	A. Okay.	10:01	5	Q. Did Ms. Wallop approach you?	10:04
6	MR. GRENDI: Eddie, I'm just going to jump in	10:01	6	A. No. That's not the case. They were	10:04
7	here. Are we going to get on topic here? We're	10:02	7	introduced through Bill Gertz. Bill Gertz called me	10:04
8	talking about --	10:02	8	and said can you set up meeting with Miles; I want to	10:04
9	MR. GREIM: We are on topic.	10:02	9	introduce Mike and French, Strategic Vision, to help	10:04
10	MR. GRENDI: Talking about Mr. Guo's family	10:02	10	Miles. So I set up meeting and we were introduced	10:04
11	and who Mr. Lianchao has met, this has nothing to do	10:02	11	that way.	10:04
12	with this dispute.	10:02	12	Q. Okay. Did you already know Mr. Gertz?	10:04
13	MR. GREIM: Please don't disrupt the	10:02	13	A. Yes.	10:04
14	deposition.	10:02	14	Q. How long have you known him?	10:05
15	MR. GRENDI: I'm not disrupting the	10:02	15	A. Thirty years.	10:05
16	deposition. I want to move it along and have it on	10:02	16	Q. Now, did Mr. Gertz, then, already seem	10:05
17	topic. You know, we're discussing irrelevant stuff	10:02	17	to know or already seem to have a specific project in	10:05
18	right now, but please continue.	10:02	18	mind for Mr. Guo?	10:05
19	BY MR. GREIM:	10:02	19	MR. GRENDI: Objection.	10:05
20	Q. When was the first time that you met	10:02	20	MR. GAVENMAN: Object to the form.	10:05
21	French Wallop?	10:02	21	THE WITNESS: Yes.	10:05
22	A. Let's see. I would say September --	10:02	22	BY MR. GREIM:	10:05
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1	October or September of 2017.	10:02	1	Q. What was that?	10:05
2	Q. Did you know her beforehand?	10:02	2	A. I think that was the original proposal	10:05
3	A. I didn't know her. I know her -- I	10:02	3	French and Mike brought with them or maybe they first	10:05
4	worked with her husband many years ago. So I had a	10:02	4	gave it to me and I shared it with Miles to handle	10:05
5	very good relationship with his office. Naturally, I	10:03	5	his communication, pretty much.	10:05
6	know of her. I didn't met her.	10:03	6	Q. So when Mr. Gertz came to you --	10:05
7	Q. Was this Senator Malcolm Wallop?	10:03	7	A. Yes.	10:05
8	A. Correct.	10:03	8	Q. -- and asked you to set up this	10:05
9	Q. What about Mr. Waller?	10:03	9	meeting --	10:05
10	A. That was the same time I met with	10:03	10	A. Yes.	10:05
11	French.	10:03	11	Q. -- did you understand that he had	10:05
12	Q. Did she you know of Mr. Waller before	10:03	12	already spoken to Ms. Wallop and Mr. Waller?	10:05
13	the fall of 2017?	10:03	13	A. Absolutely.	10:06
14	A. No.	10:03	14	MR. GRENDI: Objection.	10:06
15	Q. Let's talk a little bit about the	10:03	15	BY MR. GREIM:	10:06
16	research project that's at issue here. How is it	10:03	16	Q. At that time, let's say when -- let me	10:06
17	that -- well, let me ask you this: Did there come a	10:03	17	strike that.	10:06
18	time that you approached French Wallop about possible	10:03	18	When Mr. Gertz first contacted you about	10:06
19	work for Mr. Guo?	10:04	19	this --	10:06
20	A. Say that again.	10:04	20	A. Yeah.	10:06
21	Q. Did there come a time when you	10:04	21	Q. -- were you already aware that Mr. Guo	10:06
22	approached Ms. Wallop about possible work for Mr.	10:04	22	was looking for some type of research?	10:06

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<p>1 A. No. 10:06</p> <p>2 MR. GAVENMAN: Objection to form. 10:06</p> <p>3 MR. GRENDI: Objection to the form. 10:06</p> <p>4 THE WITNESS: Miles didn't even know what he 10:06</p> <p>5 was looking for. He had -- this is not his idea 10:06</p> <p>6 whatsoever. 10:06</p> <p>7 BY MR. GREIM: 10:06</p> <p>8 Q. Why did you agree to set up a meeting 10:06</p> <p>9 between Wallop and Waller and Guo? 10:07</p> <p>10 A. I think French and Mike had very good 10:07</p> <p>11 experience in handling strategic communication. They 10:07</p> <p>12 have a good reputation in Washington, D.C., also 10:07</p> <p>13 under the strong recommendation by Bill Gertz. I 10:07</p> <p>14 also know Senator Wallop. So I, of course, I 10:07</p> <p>15 naturally think they could do the job. 10:07</p> <p>16 Q. Before this project came along -- 10:07</p> <p>17 A. Yeah. 10:07</p> <p>18 Q. -- had you ever been involved with any 10:07</p> <p>19 sort of research project into individuals? 10:07</p> <p>20 MR. GAVENMAN: Objection to form. 10:08</p> <p>21 THE WITNESS: No. 10:08</p> <p>22 BY MR. GREIM: 10:08</p>	<p>1 but there was a huge leak of data that exposed lots 10:09</p> <p>2 of Chinese Government officials' offshore companies. 10:09</p> <p>3 I looked into that. 10:09</p> <p>4 We did a lot of research through different 10:09</p> <p>5 means and we submitted it the U.S. Government about 10:10</p> <p>6 those individuals, that corruption with a select few 10:10</p> <p>7 that specifically -- you know, based on the 10:10</p> <p>8 corruption and required the U.S. Government sanction 10:10</p> <p>9 them under the FCP Act. 10:10</p> <p>10 Q. And -- okay. And was that with the 10:10</p> <p>11 Hudson Institute? 10:10</p> <p>12 A. No. With the Citizen Power initiative 10:10</p> <p>13 and with the Hudson initiative. 10:10</p> <p>14 Q. I see. So in the fall of 2017 -- and 10:10</p> <p>15 then we'll take a break here. 10:10</p> <p>16 A. Yeah. 10:10</p> <p>17 Q. In the fall of 2017, had you discussed 10:10</p> <p>18 with Mr. Guo that he might be able to contribute to 10:10</p> <p>19 something like that, to that kind of an effort? 10:11</p> <p>20 A. Yes, I did. 10:11</p> <p>21 Q. And was that before Mr. Gertz contacted 10:11</p> <p>22 you about Ms. Wallop and Mr. Waller? 10:11</p>
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<p>1 Q. Had you ever been involved with any sort 10:08</p> <p>2 of research project into the Chinese Communist Party? 10:08</p> <p>3 MR. GAVENMAN: Objection to form. 10:08</p> <p>4 THE WITNESS: Just personally on my -- what 10:08</p> <p>5 type of research? Can you rephrase that? 10:08</p> <p>6 BY MR. GREIM: 10:08</p> <p>7 Q. Sure. Maybe a project where there would 10:08</p> <p>8 be an effort to find nonpublic information about 10:08</p> <p>9 Chinese Communist Party members. 10:08</p> <p>10 MR. GAVENMAN: Objection to form. 10:08</p> <p>11 THE WITNESS: Not in -- we have done lots of 10:08</p> <p>12 -- I've done lots of research on the Communist Party 10:08</p> <p>13 members, particularly on the corruption side. I 10:08</p> <p>14 worked with Hudson Institute. This Kleptocracy 10:08</p> <p>15 Center, I helped them with the relationship, the 10:09</p> <p>16 mapping of Chinese high-ranking government officials, 10:09</p> <p>17 their corruption, you know, potential corruption. 10:09</p> <p>18 I also worked on several other projects, 10:09</p> <p>19 tried to pinpoint the Chinese high-ranking government 10:09</p> <p>20 officials, the family corruption, and based on some 10:09</p> <p>21 of the -- based on the international consortium, you 10:09</p> <p>22 know, there was a leak from Wikipedia for the source, 10:09</p>	<p>1 A. Yes. 10:11</p> <p>2 Q. So do you know whether Mr. Guo was at 10:11</p> <p>3 least considering some sort of research project into 10:11</p> <p>4 the Chinese Communist Party members? 10:11</p> <p>5 A. It's not -- 10:11</p> <p>6 MR. GAVENMAN: Objection to form. 10:11</p> <p>7 MR. GRENDI: Objection to the form. 10:11</p> <p>8 THE WITNESS: Yeah. It's not specific. This 10:11</p> <p>9 idea, my point at the time when I communicated with 10:11</p> <p>10 Miles, I said in order to have this whistle-blowing, 10:11</p> <p>11 this disruptive momentum you made to continue -- they 10:11</p> <p>12 call it the whistle-blowing revolution to continue -- 10:11</p> <p>13 I told him you need very solid evidence to 10:11</p> <p>14 sustainable expose Chinese communist high-ranking 10:11</p> <p>15 government officials. 10:12</p> <p>16 So that was the principle. We never get into 10:12</p> <p>17 detail how to do it until Mike and French's proposal 10:12</p> <p>18 come over. I was the one -- originally, this project 10:12</p> <p>19 basically is a communication, handling the 10:12</p> <p>20 communication, P.R., not into the investigation. I 10:12</p> <p>21 was the one who approached -- I explored this 10:12</p> <p>22 possibility with French and Mike first and they said 10:12</p>

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<p>1 they can do it and then I convinced Miles to move to 10:12 2 this direction. It's not from Miles. It's from me. 10:12 3 MR. GREIM: Okay. I don't know that we've 10:12 4 been going for quite an hour yet, but let's go ahead 10:12 5 and take our first break, if that's okay. 10:13 6 THE WITNESS: All right. 10:13 7 MR. GREIM: We'll take a -- let's go ahead 10:13 8 and try to just make it five, if we can. 10:13 9 VIDEOGRAPHER: Going off the record. The 10:13 10 time is 10:15 a.m. 10:13 11 [Recess.] 10:26 12 VIDEOGRAPHER: We are back on the record. 10:26 13 The time is now 10:28 a.m. 10:26 14 BY MR. GREIM: 10:26 15 Q. Welcome back, Mr. Han. 10:26 16 A. Yes. 10:26 17 Q. Let's go again to the same timeframe 10:26 18 we've been talking about, sort of late summer, early 10:26 19 fall of 2017. At that time, is it fair to say that 10:26 20 your interactions with Mr. Guo were, number one, 10:26 21 about his asylum application -- 10:26 22 A. Correct. 10:26 </p>	<p>1 THE WITNESS: You mean through social media? 10:27 2 BY MR. GREIM: 10:27 3 Q. Through social media. 10:27 4 A. Yes. 10:27 5 Q. So you reviewed some of those items 10:27 6 yourself? 10:27 7 A. Usually, you know, his media videos are 10:27 8 too long. I usually don't watch it unless there's a 10:28 9 specific issue I found interesting. 10:28 10 Q. Now, did you talk with Mr. Guo about his 10:28 11 own background? 10:28 12 And this is -- we're going to limit it to, you 10:28 13 know, all your discussions with him up until the time 10:28 14 you introduced Strategic Vision to Mr. Guo. 10:28 15 MR. GRENDI: Object to the form. 10:28 16 MR. GAVENMAN: Object to form. 10:28 17 THE WITNESS: There are some discussions, 10:28 18 because I think that's also privileged because of 10:28 19 related to his political asylum. I think it's better 10:28 20 not for me to talk about it. 10:28 21 BY MR. GREIM: 10:28 22 Q. Did he retain you as counsel on the 10:28 </p>
Page 46	Page 48
<p>1 Q. -- and, number two, some general 10:26 2 discussions about what it would take for him to sort 10:26 3 of be a whistleblower about the Chinese Communist 10:26 4 Party? 10:26 5 MR. GAVENMAN: Objection. 10:26 6 MR. GRENDI: Object to the form. 10:26 7 THE WITNESS: He was already a whistleblower 10:26 8 at the time. My suggestion was to sustain that 10:27 9 whistleblower. 10:27 10 BY MR. GREIM: 10:27 11 Q. Now, by this point, had you done any 10:27 12 research of your own into Mr. Guo's background? 10:27 13 A. A little bit. 10:27 14 Q. Okay. What did you do to look into his 10:27 15 background? 10:27 16 A. Just online information. 10:27 17 Q. So you read some of the articles that 10:27 18 had been written about him? 10:27 19 A. Correct. 10:27 20 Q. And by this point, had he begun posting 10:27 21 things online himself? 10:27 22 MR. GRENDI: Object to the form. 10:27 </p>	<p>1 political asylum matter? 10:29 2 A. Not as counsel, but as facilitator, you 10:29 3 know, sort of a legal assistant. We -- yeah. 10:29 4 Q. Okay. So I want to make sure I'm clear. 10:29 5 Do you believe you were acting as his attorney? 10:29 6 A. I wasn't -- 10:29 7 MR. GRENDI: Object to form. 10:29 8 MR. GAVENMAN: Object to the form. 10:29 9 [Interruption.] 10:29 10 BY MR. GREIM: 10:29 11 Q. Were you able to finish your answer? 10:29 12 A. Yes. 10:29 13 Q. Were you being paid by Guo at this time? 10:29 14 A. No. 10:29 15 MR. GRENDI: Object to the form. 10:29 16 BY MR. GREIM: 10:29 17 Q. By the way, have you ever been paid by 10:29 18 Mr. Guo or by one of the entities he controls? 10:29 19 A. No. 10:30 20 MR. GRENDI: Objection. 10:30 21 MR. GAVENMAN: Objection to form. 10:30 22 BY MR. GREIM: 10:30 </p>

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1	Q. Have you been paid by the Rule of Law Foundation?	10:30	1	MR. GAVENMAN: Objection to form.	10:32
2	A. No.	10:30	2	MR. GRENDI: Objection.	10:32
3	Q. Okay. Then here's what I'll do. I'm not -- I don't believe a privilege will apply to shield his disclosures to you about his past from discovery, but what I'm going to do is just simply ask you about your knowledge. Okay?	10:30	3	THE WITNESS: A lot of that discussion, you know, this is all from the meeting.	10:32
4	And what we'll try to do is not put it -- we will try not to ask about conversations that you had with him while his asylum counsel were present. Okay?	10:30	4	MR. GAVENMAN: So I'm going to instruct you not to answer, attorney-client privilege.	10:32
5		10:30	5	THE WITNESS: Yeah.	10:32
6		10:30	6	BY MR. GREIM:	10:32
7		10:30	7	Q. Did Mr. Guo make representations to French Wallop or Mike Waller about his past?	10:32
8		10:30	8	MR. GAVENMAN: Objection to form, foundation.	10:33
9		10:30	9	THE WITNESS: During the meeting with them?	10:33
10		10:30	10	BY MR. GREIM:	10:33
11		10:30	11	Q. Yes.	10:33
12		10:30	12	A. I didn't remember exactly what he said to them. I think that maybe there is some discussion.	10:33
13	A. [Gestures.]	10:30	13	THE WITNESS: Correct.	10:33
14	Q. Okay.	10:30	14	Q. Did Mr. Guo participate in the Tieneman Square protest?	10:33
15	MR. GAVENMAN: Let me caution you. To the extent you learned anything in the course of those discussions, you shouldn't disclose that either.	10:30	15	A. During the time of that meeting?	10:33
16		10:31	16	MR. GAVENMAN: Asked and answered.	10:33
17		10:31	17	MR. GRENDI: Objection.	10:33
18	THE WITNESS: Correct.	10:31			
19	BY MR. GREIM:	10:31			
20	Q. So did you understand that Mr. Guo became a dissident during the Tieneman Square demonstrations and massacre?	10:31			
21		10:31			
22		10:31			
		Page 50			Page 52
1	A. Say that again.	10:31	1	MR. GAVENMAN: We've established that there is privilege attached to that answer. So I instruct you not to answer as well.	10:33
2	Q. Well, let me ask you a different question, because that's -- did you understand that Mr. Guo participated in the Tieneman Square demonstrations and massacre?	10:31	2	BY MR. GREIM:	10:33
3		10:31	3	Q. What do you remember about what Mr. Guo said about himself to Ms. Wallop and Mr. Waller?	10:34
4		10:31	4	A. I don't remember much.	10:34
5		10:31	5	Q. What do you remember though?	10:34
6		10:31	6	A. I remember specifically what was discussed about the proposal, you know, what to do about what information is required and the back and forth.	10:34
7		10:31	7	Q. What did Mr. Guo say he wanted to do with the research?	10:34
8		10:31	8	A. He wanted --	10:34
9	THE WITNESS: Understand?	10:31	9	MR. GAVENMAN: Objection.	10:34
10	BY MR. GREIM:	10:31	10	MR. GRENDI: Objection to form.	10:34
11	Q. Yes. Did you believe?	10:31	11	THE WITNESS: He wanted to expose the corruption of the highest-ranking members of the Communist Party.	10:34
12	MR. GRENDI: Objection.	10:31	12	BY MR. GREIM:	10:34
13	MR. GAVENMAN: Objection. This is pretty far afield from what Mr. Han is here to testify about.	10:31	13	Q. Did he say how he wanted to do that?	10:34
14	I'm not sure how this is a good use of your time, but you can keep going.	10:31			
15		10:32			
16	THE WITNESS: That discussion is with his counsel.	10:32			
17		10:32			
18	MR. GAVENMAN: So objection, privilege. I instruct you not to answer.	10:32			
19		10:32			
20	THE WITNESS: Right.	10:32			
21	BY MR. GREIM:	10:32			
22	Q. Do you know why Mr. Guo left China?	10:32			

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<p>1 A. That was during the discussion. How 10:34 2 he's going to do it, I don't think he has an idea. 10:35 3 We proposed -- I actually talked to French and Mike, 10:35 4 seeing whether we can use some unconventional way to 10:35 5 obtain this information. 10:35 6 Q. Do you know, roughly, when Mr. Guo began 10:35 7 speaking out against Communist Part members? 10:36 8 MR. GAVENMAN: Objection the form. 10:36 9 THE WITNESS: I would say in the America, at 10:36 10 least, I know, maybe April of 2017. This is during 10:36 11 his interview with Mirror Tv. 10:36 12 BY MR. GREIM: 10:36 13 Q. What the Mirror Tv? 10:36 14 A. It's a Chinese language TV, maybe the 10:36 15 largest Chinese language media group here, based in 10:36 16 New York. 10:36 17 Q. Have you seen that interview? 10:36 18 A. I didn't. 10:36 19 Q. Have you seen -- 10:36 20 A. Maybe just very part. 10:37 21 Q. I'm sorry? You may have just seen part 10:37 22 of it? 10:37 </p>	<p>1 A. Let's make it clear. 10:38 2 Q. That's right. So Mr. Gertz is the one 10:38 3 who introduced Wallop and Waller to you and then you 10:38 4 met with Wallop and Waller after that? 10:38 5 A. He is introducing them to Miles. I am 10:39 6 the facilitator to set it up. 10:39 7 Q. Okay. I'm going to direct you to -- 10:39 8 and, first of all, this article is based on Mr. 10:39 9 Gertz's interview of Mr. Guo. I want to direct you 10:39 10 first to -- before we do this, let me ask you are you 10:39 11 aware of an alleged Chinese origin cyber attack on 10:39 12 the Hudson Institute? 10:39 13 A. Yes. 10:39 14 Q. And you recall that Guo has frequently 10:39 15 cited that as evidence that the Chinese Government is 10:39 16 out to get him, basically? 10:39 17 MR. GRENDI: Objection to form. 10:39 18 MR. GAVENMAN: Objection to the form. 10:39 19 THE WITNESS: I didn't know. 10:40 20 BY MR. GREIM: 10:40 21 Q. Okay. Were you helping to plan the 10:40 22 Hudson event? 10:40 </p>
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<p>1 A. Maybe a small part of it, not directly 10:37 2 from Tv. They always, you know, like through You 10:37 3 Tube, somebody else posted it. 10:37 4 Q. Right. Have you seen other interviews 10:37 5 of Mr. Guo on You Tube or on TV? 10:37 6 A. I might, but very limited. 10:37 7 Q. Do you remember what articles you 10:37 8 reviewed about Mr. Guo's past? 10:37 9 A. I didn't. 10:37 10 [Han Exhibit No. 2 was 10:38 11 marked for identification.] 10:38 12 BY MR. GREIM: 10:38 13 Q. I'm going to show you what we are 10:38 14 marking as Exhibit 2. You'll see this is an article 10:38 15 by Bill Gertz, who we mentioned a few times earlier 10:38 16 today. It appeared October 9, 2017. 10:38 17 Is this around the time, by the way, that you 10:38 18 were introducing Ms. Wallop and Mr. Waller to Mr. 10:38 19 Guo? 10:38 20 A. I think this is before the time that he 10:38 21 was introducing. 10:38 22 Q. That's right. 10:38 </p>	<p>1 A. Correct. 10:40 2 MR. GRENDI: Objection. 10:40 3 BY MR. GREIM: 10:40 4 Q. Are you aware that the Hudson event -- 10:40 5 well, who was in charge of the HUD event within the 10:40 6 institute? 10:40 7 A. It was Charles Davidson at the 10:40 8 beginning. 10:40 9 Q. What was the last name? 10:40 10 A. Davidson, and then I took it over, 10:40 11 because he said he's not able to do it. He's afraid 10:40 12 that, you know, his son-in-law's -- his son's fiance, 10:40 13 who is Chinese, will be retaliated against. So he 10:40 14 asked me to take over. 10:40 15 Q. Who is the person at Hudson who agreed 10:40 16 to cancel the event? 10:40 17 A. I think the -- 10:40 18 MR. GRENDI: Objection to the form. 10:40 19 MR. GAVENMAN: Objection. 10:40 20 THE WITNESS: I think the head of -- the CEO, 10:40 21 Ken Winston. I don't know exactly who agreed, but it 10:41 22 was Ken called me to tell me it's cancelled. 10:41</p>
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<p>1 MR. GRENDI: Attorney Greim, I'm sorry, but 10:41 2 what does this have to do with this case? We're 10:41 3 asking about a cyber attack on the Hudson Institute. 10:41 4 I don't know when and about some events that I don't 10:41 5 know about. 10:41 6 BY MR. GREIM: 10:41 7 Q. When was the event to be held? 10:41 8 A. October. October maybe 6 or 4. I don't 10:41 9 remember. 10:41 10 Q. Of 2017? 10:41 11 A. Yes. 10:41 12 Q. And, in fact, isn't it true that the 10:41 Hudson Institute was going to cancel the event before 10:41 the cyber attack occurred? 10:41 13 MR. GRENDI: Objection to form. 10:41 14 MR. GAVENMAN: Objection, foundation. 10:41 15 THE WITNESS: I don't think so. That's not 10:41 16 what I understand. 10:41 17 BY MR. GREIM: 10:41 18 Q. You'll see that in the middle of page 3, 10:41 the top third -- 10:42 19 A. Page 4? 10:42 </p>	<p>1 MR. GAVENMAN: Objection to form, foundation. 10:42 2 BY MR. GREIM: 10:43 3 Q. How do you know? 10:43 4 A. Because I didn't remember it. I don't 10:43 5 know. I didn't remember it. 10:43 6 Q. No. I'm sorry. I'm sorry. I wasn't 10:43 clear. 10:43 7 A. Yeah. 10:43 8 Q. I'm sorry, Mr. Han. Is the statement 10:43 that he maintains close ties to supporters within the 10:43 Chinese Government and is able to obtain many 10:43 internal documents, is that a true statement? 10:43 9 MR. GRENDI: Objection to form. 10:43 10 MR. GAVENMAN: Objection to form, foundation. 10:43 11 THE WITNESS: I'm not sure. 10:43 12 BY MR. GREIM: 10:43 13 Q. If you could turn to page 5, you'll see 10:43 towards the bottom, the third little mini paragraph 10:43 from the bottom, it says: "Guo disclosed that he was 10:43 imprisoned in China after the 1989 pro-democracy 10:43 protest in Tieneman Square and spent 22 months in 10:43 prison. Chinese police also shot his brother, who 10:43 </p>
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<p>1 Q. Actually, page 3. It's -- they're front 10:42 and back. So you'll see at the bottom, it's got the 10:42 page number. 10:42 2 A. Yes. 10:42 3 Q. Do you see where it says: "Guo said he 10:42 maintains close ties with supporters within the 10:42 Chinese Government and security system and is able to 10:42 obtain many internal documents." 10:42 4 A. A yeah. 10:42 5 Q. Did Guo make that representation to 10:42 Strategic Vision? 10:42 6 A. I didn't remember. 10:42 7 MR. GRENDI: Objection to form. 10:42 8 MR. GAVENMAN: Objection to the form, foundation. 10:42 9 BY MR. GREIM: 10:42 10 Q. So just so I'm clear, your answer is not 10:42 that you -- the answer is not no; it's that you don't 10:42 remember? 10:42 11 A. I don't remember. 10:42 12 Q. Is that a true statement? 10:42 13 A. Yes. 10:42 </p>	<p>1 later died." 10:43 2 The first sentence about Tieneman Square, did 10:44 Mr. Guo make that representation to Strategic Vision? 10:44 3 MR. GAVENMAN: Objection to form. 10:44 4 MR. GRENDI: Objection to the form. 10:44 5 THE WITNESS: He might. 10:44 6 BY MR. GREIM: 10:44 7 Q. Is it a true statement? 10:44 8 MR. GAVENMAN: Objection. 10:44 9 MR. GRENDI: Objection. 10:44 10 MR. GAVENMAN: Objection to form. We've 10:44 11 already established there's a privilege attached to 10:44 12 that and asked and answered several times. So we 10:44 13 can't go there. We've established there's privilege. 10:44 14 MR. GREIM: No. No, we have not established 10:44 15 there's privilege. If this witness actually was used 10:44 16 to ask for and receive legal advice from the Clark 10:44 17 Hill law firm, it's one thing, but the actual facts, 10:44 18 whether this is true or not and whether the witness 10:44 19 even knows if it's true or not, is relevant to this 10:44 20 case. If the witness doesn't know if it's true or 10:44 21 not, then that can be the answer. 10:44 </p>
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<p>1 So I'm not asking for any comments that Mr. 10:44 2 Guo made. I'm not asking for any comments that his 10:45 3 attorneys made. You cannot just shield information, 10:45 4 actual data, under the claim of attorney-client 10:45 5 privilege. 10:45 6 MR. GAVENMAN: Well, that's true. We've 10:45 7 established that any discussions he had about this, 10:45 8 any information that he gathered came in the form of 10:45 9 an, you know, attorney-client privilege. 10:45 10 MR. GREIM: No. We did not establish that. 10:45 11 The witness testified that he has seen other sources 10:45 12 other than through discussions about -- with counsel 10:45 13 about the asylum process. 10:45 14 MR. GAVENMAN: Well, I don't recall that 10:45 15 happening. 10:45 16 MR. GRENDI: I don't either. 10:45 17 MR. GAVENMAN: Well, look. I mean, this is a 10:45 18 fact that you can get from some other witness. He's 10:45 19 already said what he's had to say about it. The only 10:45 20 information, as far as I understand, that he has 10:45 21 about it came via a privileged communication. If you 10:45 22 need to go to the judge to try and break that 10:45 </p>	<p>1 You can ask whether -- 10:46 2 MR. GREIM: Okay. I'll ask him. Now that 10:46 3 you've suggested that to the witness, I guess I'll go 10:46 4 ahead and ask the question. 10:46 5 MR. GAVENMAN: I'm not trying to suggest 10:46 6 anything to the witness. I'm trying to keep the zone 10:46 7 of privilege where it belongs, which is private. You 10:46 8 can ask other questions. You can ask about facts, 10:46 9 but this one particular fact, he doesn't know 10:47 10 anything else besides what he has in the zone of 10:47 11 privilege. 10:47 12 MR. GREIM: That's patently not what the 10:47 13 witness just testified. I'll ask the witness. 10:47 14 BY MR. GREIM: 10:47 15 Q. Mr. Han, is it your testimony that 10:47 everything you know about Mr. Guo is also subject to 10:47 privilege; it's all gained as a result of an 10:47 attorney-client relationship? 10:47 16 MR. GRENDI: Objection to the form. 10:47 17 MR. GAVENMAN: For the record, that is 10:47 18 nothing like what I just said, but go on. 10:47 19 THE WITNESS: No. 10:47 </p>
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<p>1 privilege, that's up to you, but that's my 10:45 2 understanding and that's where we stand. 10:45 3 MR. GREIM: Well, okay. I think we've 10:45 4 changed around the witness' testimony here. 10:45 5 MR. GAVENMAN: I imagine you get this at a 10:45 6 different deposition rather than from Mr. Han, 10:46 7 whether or not something happened. 10:46 8 MR. GREIM: Well, this witness was also the 10:46 9 interpreter between Mr. Guo and my client when this 10:46 10 representation may well have been made, and he has an 10:46 11 extensive background in this area. He's reviewed 10:46 12 articles. He's listened to parts of at least some TV 10:46 13 broadcasts where Guo makes representations. 10:46 14 The underlying facts are not privileged and 10:46 15 the witness has never testified that all of his 10:46 16 information comes from privileged discussions. He's 10:46 17 never said it. It wouldn't be true, and so I'm 10:46 18 entitled to know whether the witness knows whether 10:46 19 this is true or not. 10:46 20 MR. GAVENMAN: He answered that the only 10:46 21 information that he has about whether this particular 10:46 22 sentence is true came from a privileged discussion. 10:46 </p>	<p>1 BY MR. GREIM: 10:47 2 Q. How about this particular sentence about 10:47 Tieneman Square; is the only information -- first of 10:47 all, do you have any information that you've heard 10:47 from Mr. Guo about the sentence we just asked you 10:47 about? 10:47 3 A. I know his brother definitely was shot 10:47 4 by the police and killed by the police. 10:47 5 Q. How do you know that? 10:47 6 A. That is during my research, I saw some 10:47 7 article about it and then there was some discussion 10:48 8 previously. Miles told me the reason why he's angry. 10:48 9 He's anti-CCP because of the death of the brother. 10:48 10 Q. And did your research -- so the research 10:48 that you found aside from the direct quote that you 10:48 gave us just now from Mr. Guo, was that research a 10:48 news article in which Mr. Guo was quoted? 10:48 11 A. Yeah. 10:48 12 Q. Okay. And so the first part of the 10:48 sentence, do you have any information about whether 10:48 that is true or not? 10:48 13 A. I don't have any information. 10:48 </p>

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1	MR. GAVENMAN: Objection.	10:48	1	I would like to --	10:51
2	MR. GRENDI: Objection to form. What's the	10:48	2	MR. GAVENMAN: That's debatable.	10:51
3	question? I don't understand the question.	10:48	3	BY MR. GREIM:	10:51
4	BY MR. GREIM:	10:48	4	Q. I would like to now ask you, you said	10:51
5	Q. Okay. Your answer, sir, was you don't	10:48	5	that -- well, let me ask you this: Do you know when	10:51
6	have any information about whether the first sentence	10:48	6	Mr. Guo left China?	10:51
7	is true or not?	10:48	7	MR. GAVENMAN: Objection to form.	10:51
8	A. No.	10:48	8	MR. GRENDI: Objection.	10:51
9	Q. Have you read articles about -- in which	10:49	9	THE WITNESS: I don't remember exactly, maybe	10:51
10	Mr. Guo makes that claim?	10:49	10	2014 or 2015. No. I don't remember exactly.	10:51
11	MR. GRENDI: Objection to the form.	10:49	11	BY MR. GREIM:	10:51
12	THE WITNESS: No.	10:49	12	Q. Is that something that you, yourself,	10:51
13	BY MR. GREIM:	10:49	13	have investigated?	10:51
14	Q. Have you read any articles or done any	10:49	14	A. Say that again.	10:52
15	research into why Mr. Guo left China?	10:49	15	Q. Is that something that you, yourself,	10:52
16	A. There are lots of articles about that,	10:49	16	have investigated?	10:52
17	different reasons cited. So I didn't specifically	10:49	17	MR. GAVENMAN: Objection to form.	10:52
18	question that.	10:50	18	MR. GRENDI: Objection.	10:52
19	Q. Mr. Guo, himself, has given different	10:50	19	THE WITNESS: Investigated when he left	10:52
20	reasons for why he left China; isn't that right?	10:50	20	China?	10:52
21	MR. GRENDI: Objection to the form	10:50	21	BY MR. GREIM:	10:52
22	MR. GAVENMAN: Objection to form.	10:50	22	Q. Right.	10:52
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1	THE WITNESS: I don't remember exactly what	10:50	1	A. I looked at articles, but I don't know	10:52
2	he said yeah, but I think he's pretty consistent on	10:50	2	whether I can trust those articles, but I don't	10:52
3	that regard.	10:50	3	remember exactly when he left. I would say either	10:52
4	MR. GRENDI: I'm sorry. I have to ask why	10:50	4	'14 or '15.	10:52
5	are you asking this witness about what articles he's	10:50	5	Q. Do you know whether Mr. Guo was detained	10:52
6	read? Are you trying to establish whether he has	10:50	6	on January 9, 2015 and then released?	10:52
7	hearsay knowledge of the underlying facts you're	10:50	7	A. 1915?	10:52
8	trying to prove? I just don't understand why you're	10:50	8	Q. January 9, 2015?	10:52
9	going here.	10:50	9	A. I didn't know that.	10:52
10	MR. GREIM: I'm trying to establish whether	10:50	10	Q. Would it be surprising that the Chinese	10:52
11	the representations that Mr. Guo made to Strategic	10:50	11	regime would have detained him and then released him?	10:53
12	Vision were true or false.	10:50	12	MR. GRENDI: Objection to form.	10:53
13	MR. GRENDI: And how would you do that with	10:50	13	MR. GAVENMAN: Objection to the form.	10:53
14	newspaper articles that Mr. Lianchao has never -- or	10:50	14	THE WITNESS: Can you rephrase that?	10:53
15	maybe read or maybe he didn't? How does that prove	10:51	15	BY MR. GREIM:	10:53
16	one thing or another?	10:51	16	Q. Sure.	10:53
17	MR. GREIM: Mr. Han, obviously, cares about	10:51	17	A. Okay.	10:53
18	the issues aside from any work he's done for Mr. Guo.	10:51	18	Q. Yeah. Let me say given what you know --	10:53
19	MR. GRENDI: Sure.	10:51	19	A. Yeah.	10:53
20	MR. GREIM: I want to know -- I'm trying to	10:51	20	Q. -- about the allegations Mr. Guo has	10:53
21	get information that will help me show whether this	10:51	21	made --	10:53
22	is true or false, and we're making some progress. So	10:51	22	A. Yeah.	10:53
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1	Q. -- would it be surprising that the	10:53	1	surprising for a dissident to attempt to invest	10:56
2	regime would have detained him and then released him	10:53	2	hundreds of millions of dollars into a mainland	10:56
3	before he came to the United States?	10:53	3	entity?	10:56
4	MR. GAVENMAN: Objection to the form.	10:53	4	MR. GAVENMAN: Objection to the form.	10:56
5	MR. GRENDI: Objection to form.	10:53	5	MR. GRENDI: Objection to form.	10:56
6	THE WITNESS: Surprising to me? No.	10:53	6	THE WITNESS: Can you rephrase that?	10:56
7	BY MR. GREIM:	10:53	7	MR. GREIM: I might -- I felt good about it.	10:56
8	Q. Why not?	10:53	8	I think I'm going to and I'll just read it slowly.	10:56
9	MR. GAVENMAN: Objection to form.	10:53	9	Why don't you, actually.	10:56
10	MR. GRENDI: Objection.	10:53	10	[Whereupon, the pending question was read	10:56
11	THE WITNESS: The Chinese regime is so	10:53	11	back by the court reporter.]	10:56
12	sneaky, so deceptive. They can do anything, you	10:53	12	MR. GAVENMAN: Objection to form.	10:56
13	know, release you, detain you, release you, put you	10:53	13	MR. GRENDI: Objection.	10:56
14	on leash. There are so many things they can do.	10:53	14	THE WITNESS: It's not surprising. I think,	10:56
15	BY MR. GREIM:	10:53	15	as I said before, Chinese regime is so deceitful and	10:56
16	Q. Do you know when Mr. Guo -- well, let me	10:53	16	they do lots of different things and Chinese	10:56
17	ask this: Do you know whether Mr. Guo has broken	10:54	17	dissidents also use the regime, and I have heard many	10:57
18	with the regime definitively?	10:54	18	people say, you know, take Chinese Government money,	10:57
19	MR. GAVENMAN: Objection to form.	10:54	19	why not, we can use it for our own costs. I mean,	10:57
20	THE WITNESS: No.	10:54	20	this is from different activists.	10:57
21	MR. GRENDI: Objection to form.	10:54	21	So I'm not surprised to hear that.	10:57
22	BY MR. GREIM:	10:54	22	BY MR. GREIM:	10:57
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1	Q. So my first question was whether. My	10:54	1	Q. So if I understand your answer	10:57
2	next question is -- well, I guess your answer was,	10:54	2	correctly, it's at least possible that a dissident	10:57
3	no, you don't know whether he has?	10:54	3	could put money back into the mainland and actually	10:57
4	A. No.	10:54	4	use the regime themselves?	10:57
5	Q. Do you know the nature of his current	10:54	5	A. Correct.	10:57
6	relationship, if any, with the Chinese regime?	10:54	6	MR. GRENDI: Objection to form.	10:57
7	A. No.	10:54	7	MR. GAVENMAN: Objection.	10:58
8	Q. Do you know whether all of Mr. Guo's	10:54	8	THE WITNESS: Correct.	10:58
9	mainland assets have been seized or frozen?	10:55	9	BY MR. GREIM:	10:58
10	MR. GAVENMAN: Objection to form.	10:55	10	Q. Have you heard Mr. Guo make statements	10:58
11	MR. GRENDI: Objection to form.	10:55	11	that he has absolute faith in General Secretary Xi?	10:58
12	THE WITNESS: It's from the news report.	10:55	12	MR. GRENDI: Objection to the form.	10:58
13	BY MR. GREIM:	10:55	13	THE WITNESS: No.	10:58
14	Q. Has Mr. Guo, himself, told you that?	10:55	14	BY MR. GREIM:	10:58
15	A. No.	10:55	15	Q. Would it surprise you if he did make	10:58
16	Q. Has Mr. Guo told you that he cannot move	10:55	16	such a statement?	10:58
17	any money out of Hong Kong?	10:55	17	A. No.	10:58
18	MR. GRENDI: Objection to the form.	10:55	18	MR. GRENDI: Objection.	10:58
19	THE WITNESS: No.	10:55	19	MR. GAVENMAN: Objection.	10:58
20	BY MR. GREIM:	10:55	20	BY MR. GREIM:	10:58
21	Q. Knowing how the Chinese regime treats	10:55	21	Q. Why not?	10:58
22	individuals who claim to be dissidents, would it be	10:55	22	MR. GAVENMAN: Objection to form.	10:58

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1 THE WITNESS: In the private meeting, he told 2 me that he's -- he expressed a very completely 3 different view about Xi, about Communist Party. 4 BY MR. GREIM: 5 Q. What do you mean, a completely different 6 view? 7 A. He's opposing Xi's dictatorship -- put 8 it that way -- strongly. 9 Q. Sir, I'm going to play for you a video 10 of Mr. Guo speaking. I'm going to see if this is 11 something you have heard before and I'm going to see 12 if you at least recognize his voice. 13 A. Yeah. 14 Q. This will be in Chinese. So the court 15 reporter will not be able to transcribe it. 16 A. Okay. 17 Q. However, I'm going to distribute a 18 translation that we have already served on our 19 opposing counsel and I'll make it available to you as 20 well. We are going to mark this as Han 3. 21 [Han Exhibit No. 3 was 22 marked for identification.]	10:58 10:58 10:58 10:58 10:58 10:58 10:58 10:59 10:59 10:59 10:59 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:00 11:01	1 [Video presentation.] 2 MR. GREIM: All right. That's the end of the 3 clip. 4 MR. GRENDI: I'm sorry. Objection. I just 5 don't understand. Are there two speakers on that or 6 just one? 7 MR. GREIM: This was -- let me read some more 8 background on this. This was pulled from You Tube, 9 https://youtu.be/whKwuLpKbUQ published April 29, 10 2017. 11 Let me ask the witness, first of all -- 12 MR. GRENDI: Hold on. 13 BY MR. GREIM: 14 Q. Do you recognize the voice on the 15 recording? 16 MR. GRENDI: Objection. Are there two 17 voices? I don't understand. It says Speaker 1. 18 MR. GREIM: Please don't interrupt the 19 questioning. There's only one thing that says 20 Speaker 1. There are not two voices. 21 MR. GRENDI: I don't know. 22 MR. GREIM: Please don't interrupt. Please	11:02 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:05 11:06 11:06
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1 MR. GREIM: I'm going to arrange these 2 speakers so that, hopefully, everybody can hear this 3 really well. 4 MR. GRENDI: Is this a certified translation? 5 MR. GREIM: Yeah. The affidavit that you 6 received goes with all of these. This has been 7 produced to you. 8 MR. GRENDI: I got a lot of stuff in the last 9 few days. 10 All right. On your representation this is 11 certified translation, I would object to the extent 12 it's not certified. 13 MR. GREIM: Okay. 14 MR. GRENDI: Thank you. 15 MR. GREIM: All right. And here we go. This 16 is about a three-minute-and-one-second clip. 17 Actually, the You Tube version of this, sir, has -- I 18 know someone from You Tube tried to translate it, and 19 just so you can see what I'm playing, I'm going to 20 turn my computer screen around so that you can see 21 it. I know it's some distance from you, but I'm 22 going to ahead and play.	11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:01 11:02 11:02	1 don't interrupt the questioning. 2 MR. GRENDI: Objection to the entire line of 3 questioning. You may continue. 4 MR. GAVENMAN: I object as well. 5 BY MR. GREIM: 6 Q. All right. Do you recognize the voice 7 on the recording, sir? 8 A. Yes. 9 Q. Whose voice is that? 10 A. Miles. 11 Q. I'm sorry? 12 A. Miles. 13 Q. Miles? 14 A. Yes. 15 Q. Have you heard any part of this before? 16 A. No. This is actually my first time. 17 Q. And did you hear in the opening that Mr. 18 Guo said I have absolute faith in General Secretary 19 Xi? 20 MR. GRENDI: Objection. 21 THE WITNESS: Yes. 22 BY MR. GREIM:	11:06 11:06
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21 (Pages 78 to 81)

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<p>1 there, because everybody -- most people at this 11:09 2 table, I think, have the same goals and there are -- 11:09 3 we probably do not need to get into the answer to 11:09 4 that question. 11:09</p> <p>5 Okay. There's just no need to do that here. 11:09 6 A. Okay. 11:09 7 MR. GRENDI: Wait. Stop. 11:09 8 MR. PODHASKIE: It's one of his best friends 11:09 9 on Twitter. Let him go on and explain. 11:09 10 MR. GRENDI: Hold on, Dan. You don't have an 11:09 11 appearance here. 11:09 12 MR. GREIM: I would ask Mr. Podhaskie to 11:09 13 please stop interfering with the deposition. 11:09 14 MR. GAVENMAN: As Mr. Han's counsel, he has 11:09 15 to be allowed to answer the question completely. You 11:09 16 asked a question. He can answer. 11:10 17 MR. GREIM: Fair enough. Fair enough. I 11:10 18 detected some hesitance and I wanted to signal to the 11:10 19 witness that we didn't need to hear it, but if you 11:10 20 would like to finish the answer, go ahead. 11:10 21 MR. GAVENMAN: Please complete your answer, 11:10 22 Mr. Han. 11:10</p>	<p>1 suing others. It's the other side suing him as well. 11:11 2 BY MR. GREIM: 11:11 3 Q. Is it your testimony that every 11:11 4 dissident that Mr. Guo is in litigation with -- well, 11:11 5 let me back up. That's a closed question. 11:11 6 Let me just ask you this. 11:11 7 A. Yeah. 11:12 8 Q. Are you aware of whether Mr. Guo is in 11:12 9 litigation with any dissident who is not working with 11:12 10 the Chinese regime? 11:12 11 MR. GAVENMAN: Objection to form. 11:12 12 MR. GRENDI: Objection to form. 11:12 13 THE WITNESS: I'm not sure. I think there 11:12 14 are lots of them working with the regime, because 11:12 15 they, themselves, cannot afford this large amount 11:12 16 legal bill. Nobody wants to pay that. 11:12 17 BY MR. GREIM: 11:12 18 Q. As you said earlier, could some of these 11:12 19 dissidents be trying in their own way to use the 11:12 20 regime? 11:12 21 MR. GAVENMAN: Objection, form. 11:12 22 MR. GRENDI: Objection to form. 11:12</p>
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<p>1 THE WITNESS: Yes. We have evidence that Xi 11:10 2 Nuo is working with the Chinese regime. I have 11:10 3 submitted that evidence to the FBI. 11:10 4 BY MR. GREIM: 11:10 5 Q. By the way, was there anything that you 11:10 6 heard in the clip that was inaudible to you or that 11:10 7 you did not understand? 11:10 8 A. No. 11:10 9 Q. Are you aware that Mr. Guo has filed 11:10 10 several lawsuits against dissidents in the United 11:11 11 States? 11:11 12 MR. GAVENMAN: Objection to form. 11:11 13 MR. GRENDI: Objection to form. 11:11 14 THE WITNESS: Yes. 11:11 15 BY MR. GREIM: 11:11 16 Q. And have you advised Mr. Guo on those 11:11 17 lawsuits? 11:11 18 MR. GAVENMAN: Objection to form. 11:11 19 THE WITNESS: No, but I did ask him not to 11:11 20 get involved, because my reason is this is Chinese 11:11 21 Communist regime strategy, to get him involved in the 11:11 22 lawsuit, consume his resources. It's not just him 11:11</p>	<p>1 MR. GAVENMAN: Foundation. 11:12 2 THE WITNESS: Yes. 11:12 3 BY MR. GREIM: 11:12 4 Q. Earlier, we talked a little bit about 11:12 5 the visit by Chinese authorities to Mr. Guo in the 11:13 6 United States. 11:13 7 A. Yeah. 11:13 8 Q. Do you recall when that occurred? 11:13 9 A. I didn't. 11:13 10 Q. Does May 2017 sound correct to you? 11:13 11 A. Yes. 11:13 12 MR. GAVENMAN: Objection to form. 11:13 13 MR. GRENDI: Objection to form. 11:13 14 BY MR. GREIM: 11:13 15 Q. Is that one of the -- did part of your 11:13 16 research into Mr. Guo involve reading accounts of the 11:13 17 visit by Chinese officials to Guo's apartment? 11:13 18 MR. GRENDI: Objection. 11:14 19 THE WITNESS: Yes. 11:14 20 BY MR. GREIM: 11:14 21 Q. And did Guo also discuss the visit with 11:14 22 you? 11:14</p>

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<p>1 A. That was with the counsel. 11:14</p> <p>2 Q. With counsel? 11:14</p> <p>3 A. Yes. 11:14</p> <p>4 Q. Okay. By the way, just to -- I want to 11:14</p> <p>5 be clear about this. Who were the names of the Clark 11:14</p> <p>6 Hill attorneys who were involved in that matter? Do 11:14</p> <p>7 you remember? 11:14</p> <p>8 MR. GRENDI: Objection. 11:14</p> <p>9 THE WITNESS: Thomas Ragland. 11:14</p> <p>10 BY MR. GREIM: 11:14</p> <p>11 Q. Okay. 11:14</p> <p>12 A. It's public information, by the way. 11:14</p> <p>13 Q. Jay Johnson, was he one of them? 11:14</p> <p>14 A. Never heard of him. 11:14</p> <p>15 Q. Are you aware that Mr. Guo recorded all 11:14</p> <p>16 or large portions of those meetings? 11:15</p> <p>17 MR. GAVENMAN: Objection -- 11:15</p> <p>18 MR. GRENDI: Objection. 11:15</p> <p>19 MR. GAVENMAN: -- to form. You're talking 11:15</p> <p>20 about a privileged conversation? 11:15</p> <p>21 MR. GREIM: No. I'm sorry. Let me -- not 11:15</p> <p>22 meetings with Clark Hill. 11:15</p>	<p>1 MR. GREIM: Sure, but whether Mr. Guo has 11:15</p> <p>2 recordings of these meetings is not a privileged 11:15</p> <p>3 matter. Is it a fact. It either happened or it did 11:16</p> <p>4 not. 11:16</p> <p>5 THE WITNESS: I didn't know that. 11:16</p> <p>6 MR. GAVENMAN: Please don't reveal anything 11:16</p> <p>7 that you learned in a privileged conversation. 11:16</p> <p>8 THE WITNESS: Yeah. I didn't know whatever 11:16</p> <p>9 public information, but all I know is what I learned 11:16</p> <p>10 from the counsel regarding the meetings. 11:16</p> <p>11 [Han Exhibit No. 4 was 11:16</p> <p>12 marked for identification.] 11:16</p> <p>13 BY MR. GREIM: 11:16</p> <p>14 Q. I'm going to show you what we're marking 11:16</p> <p>15 as Exhibit 4, and you'll see this is a "Wall Street 11:16</p> <p>16 Journal" article from October 22, 2017 and it goes on 11:17</p> <p>17 for about six pages. 11:17</p> <p>18 A. Right. 11:17</p> <p>19 Q. But you'll see that the main topic here 11:17</p> <p>20 is about the visit of the Chinese officials to Mr. 11:17</p> <p>21 Guo. 11:17</p> <p>22 A. Right. 11:17</p>
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<p>1 MR. GAVENMAN: Okay. 11:15</p> <p>2 BY MR. GREIM: 11:15</p> <p>3 Q. Are you aware that Mr. Guo recorded all 11:15</p> <p>4 or portions of his meetings with Chinese officials? 11:15</p> <p>5 MR. GAVENMAN: Objection. 11:15</p> <p>6 MR. GRENDI: Objection to form, relevance. 11:15</p> <p>7 THE WITNESS: With the counsel. That was 11:15</p> <p>8 also with counsel. 11:15</p> <p>9 BY MR. GREIM: 11:15</p> <p>10 Q. I'm sorry. I could not actually hear 11:15</p> <p>11 your answer over the objections. You're saying, yes, 11:15</p> <p>12 he recorded meetings with counsel? 11:15</p> <p>13 MR. GAVENMAN: No. 11:15</p> <p>14 THE WITNESS: No. I said that's information 11:15</p> <p>15 -- 11:15</p> <p>16 MR. GAVENMAN: Mr. Han. Mr. Han. 11:15</p> <p>17 So what he's saying is, again, there was 11:15</p> <p>18 conversations with counsel present that were 11:15</p> <p>19 privileged conversations where he discussed this 11:15</p> <p>20 material. So he cannot get into that area. That's 11:15</p> <p>21 what he's saying. 11:15</p> <p>22 Please do not answer. 11:15</p>	<p>1 Q. Correct? 11:17</p> <p>2 A. Um-hum. 11:17</p> <p>3 Q. And is that a picture of Mr. Guo at the 11:17</p> <p>4 top there? 11:17</p> <p>5 A. Yes. 11:17</p> <p>6 Q. Is that taken in his Sherry Netherland 11:17</p> <p>7 apartment? 11:17</p> <p>8 MR. GRENDI: Objection. 11:17</p> <p>9 THE WITNESS: It looks like it. 11:17</p> <p>10 BY MR. GREIM: 11:17</p> <p>11 Q. All right. Do you see in the third 11:17</p> <p>12 paragraph, it says: "Liu Yanping, the lead official, 11:17</p> <p>13 said he had come on behalf of Beijing 'to find a 11:17</p> <p>14 solution', according to Mr. Guo and a partial audio 11:18</p> <p>15 recording Mr. Guo said he made of the May encounter 11:18</p> <p>16 and posted online in September." 11:18</p> <p>17 Do you see that? 11:18</p> <p>18 A. Um-hum. 11:18</p> <p>19 Q. Now let me ask you -- I don't want to 11:18</p> <p>20 know -- well, unfortunately, you've got this 11:18</p> <p>21 continuing instruction and if you heard it from 11:18</p> <p>22 counsel, you can't even state the facts. I'm going 11:18</p>
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1	to ask you whether you recall reading articles like	11:18	1	THE WITNESS: That is with the counsel in the	11:20
2	this about Mr. Guo's recording of the May encounter.	11:18	2	meeting.	11:20
3	MR. GRENDI: Objection.	11:18	3	MR. GREIM: Wait a minute. Wait, wait, wait.	11:20
4	THE WITNESS: This is the first time I read	11:18	4	Now, whether he's listened to it is not	11:20
5	this article.	11:18	5	privileged information. I'm not going to ask him the	11:20
6	BY MR. GREIM:	11:18	6	content of it, but it's a yes or no question -- yes	11:21
7	Q. Okay. Well, when you first met Mr. Guo,	11:18	7	or no answer whether he has listened to it. I don't	11:21
8	I suppose this had already happened, hadn't it?	11:18	8	want to know anything else about the circumstance.	11:21
9	Because you said you met him for the first time in	11:19	9	MR. GAVENMAN: I'm also very concerned here	11:21
10	July or August?	11:19	10	about attorney work product privilege and what's	11:21
11	A. Correct.	11:19	11	happening in that case. I mean, it's not just the	11:21
12	MR. GRENDI: Objection.	11:19	12	facts. It's not just what communications. There's	11:21
13	BY MR. GREIM:	11:19	13	attorney work product that's happening here, clearly,	11:21
14	Q. By the way, have you met Steven Bannon	11:19	14	and you need to stay away from it.	11:21
15	before?	11:19	15	You need to stay away. I don't know why	11:21
16	MR. GRENDI: Objection. What does that have	11:19	16	you're bothering to go in there anyway, recordings,	11:21
17	to do with this case, Counsel? I'm sorry, but Steve	11:19	17	not recordings. I mean, we don't need to be invading	11:21
18	Bannon, where does he come in? I just don't get it.	11:19	18	this privilege to get to the facts of this case.	11:21
19	MR. GREIM: Read the counterclaim.	11:19	19	I mean, we're going to have a long day here	11:21
20	MR. GRENDI: I have. You put in stuff about	11:19	20	if we're doing this and let's stay away from	11:21
21	Steve Bannon that has nothing to do with the case.	11:19	21	privileged information and get to the parts that	11:21
22	MR. GREIM: Please don't use up our time on	11:19	22	matter, please.	11:21
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1	the record.	11:19	1	MR. GREIM: Well, we disagree to your claims	11:21
2	Go ahead.	11:19	2	of privilege. We're just trying to work around them	11:21
3	THE WITNESS: Before this?	11:19	3	so that we can get through.	11:21
4	BY MR. GREIM:	11:19	4	BY MR. GREIM:	11:21
5	Q. Yes.	11:19	5	Q. Did you -- let me -- okay. Let's go a	11:21
6	A. Before what?	11:19	6	little further.	11:22
7	Q. Well, let's say when did you -- have you	11:19	7	Why did you say that this incident of Mr. Guo	11:22
8	worked with Mr. Bannon in connection with Mr. Guo?	11:19	8	meeting with the Chinese officials may have been a	11:22
9	MR. GAVENMAN: Objection to form.	11:19	9	turning point for Mr. Guo?	11:22
10	MR. GRENDI: Objection.	11:19	10	MR. GRENDI: Objection.	11:22
11	THE WITNESS: Bannon was introduced to him on	11:19	11	MR. GAVENMAN: Objection.	11:22
12	October, early October of 2017.	11:19	12	THE WITNESS: I think because they were	11:22
13	BY MR. GREIM:	11:19	13	arrested, detained by the FBI. I think the Chinese	11:22
14	Q. By you?	11:19	14	official may have believed that Miles sold them out	11:22
15	A. By Bill Gertz, not me.	11:19	15	and that he's working with American Government,	11:23
16	Q. Now, how do you know that?	11:20	16	busted them, take away their cellphones, computers.	11:23
17	A. Because I was with them.	11:20	17	Yeah.	11:23
18	Q. Okay. Have you ever listened to a	11:20	18	BY MR. GREIM:	11:23
19	recording of Mr. Guo's meeting with Chinese	11:20	19	Q. All right. So that's -- I understand	11:23
20	officials?	11:20	20	that's what you think the Chinese officials may	11:23
21	MR. GRENDI: Objection.	11:20	21	believe.	11:23
22	MR. GAVENMAN: Objection.	11:20	22	A. Right.	11:23
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<p>1 Q. Now my next question is how do you know 11:23 2 -- what makes you believe that? What facts do you 11:23 3 have that form the basis for that belief? 11:23 4 MR. GAVENMAN: Objection to form. 11:23 5 MR. GRENDI: Objection. 11:23 6 THE WITNESS: I think since then, there was a 11:23 7 -- as far as I can tell, the Chinese never sent 11:23 8 another team to communicate with Miles, just on my 11:23 9 knowledge, based on my best knowledge. 11:23 10 BY MR. GREIM: 11:24 11 Q. Since then, has Guo sent anyone to China 11:24 12 to communicate with Chinese officials? 11:24 13 A. I don't know. 11:24 14 MR. GRENDI: Objection. 11:24 15 MR. GAVENMAN: Objection to form. 11:24 16 THE WITNESS: I have no knowledge. 11:24 17 BY MR. GREIM: 11:24 18 Q. Do you know whether Guo sent Steve 11:24 19 Bannon to communicate with Wang Qishan? 11:24 20 MR. GAVENMAN: Objection. 11:24 21 MR. GRENDI: Objection, relevance. 11:24 22 THE WITNESS: That's not possible. 11:24 </p>	<p>1 THE WITNESS: I don't know. This is a little 11:25 2 too far, you know. 11:25 3 MR. GRENDI: I'm just going to hop in here. 11:25 4 If we went to the judge with this right now, she 11:25 5 would say why are you asking these questions, please 11:25 6 move it along. I'm pretty sure that's what she would 11:25 7 say, because this has zero connection to whether or 11:25 8 not Eastern Profit -- 11:26 9 THE WITNESS: Can I get some water? 11:26 10 MR. GRENDI: -- and Strategic Vision -- 11:26 11 MR. GREIM: Why don't we do this. We have 11:26 12 five minutes left. I mean, this goes directly to 11:26 13 whether Mr. Guo is working with the regime or not. 11:26 14 This would be one of the contacts, but let's take a 11:26 15 break. We have five minutes left on the tape. Let's 11:26 16 take about a five- or ten-minute break. 11:26 17 VIDEOGRAPHER: This end Disk No. 1, going off 11:26 18 the record. The time is now 11:28 a.m. 11:26 19 [Recess.] 11:41 20 VIDEOGRAPHER: This begins Disk No. 2 in the 11:41 21 video deposition of Lianchao Han. We are back on the 11:41 22 record. The time is 11:43 a.m. 11:41 </p>
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<p>1 BY MR. GREIM: 11:24 2 Q. Why do you say that? 11:24 3 A. Wang Qishan invited Bannon to China 11:24 4 before he even know who Miles Kwok is. 11:24 5 Q. Before who knows who Miles Kwok was? 11:24 6 A. Before Steve had ever heard his name. 11:24 7 Q. How do you know that? 11:24 8 A. Because at the time, he was -- the 11:24 9 timeline, just look at the timeline. I forgot when 11:24 10 he went to China, but that was way before Steve met 11:25 11 with the Miles Kwok. 11:25 12 Q. Do you know who arranged the Bannon-Wang 11:25 13 Qishan meeting? 11:25 14 MR. GRENDI: Objection. 11:25 15 MR. GAVENMAN: Objection. 11:25 16 THE WITNESS: Is that relevant? I think John 11:25 17 Thornton. 11:25 18 BY MR. GREIM: 11:25 19 Q. And do you know whether Bannon discussed 11:25 20 Guo with Wang Qishan? 11:25 21 MR. GAVENMAN: Objection. 11:25 22 MR. GRENDI: Objection. How would he know? 11:25 </p>	<p>1 BY MR. GREIM: 11:41 2 Q. Okay. Mr. Han -- 11:41 3 A. Yes. 11:41 4 Q. -- I'm going to make sure something is 11:41 5 very clear from our last series of questions. Is it 11:41 6 true that you have knowledge of the purpose of the 11:42 7 Bannon trip to Wang Qishan? 11:42 8 MR. GRENDI: Objection. 11:42 9 MR. GAVENMAN: Objection. 11:42 10 You can answer. 11:42 11 THE WITNESS: I don't know exactly what's the 11:42 12 purpose, but I know for a fact it has nothing to do 11:42 13 with Miles Kwok. 11:42 14 BY MR. GREIM: 11:42 15 Q. Well, now that you -- I have to ask you 11:42 16 how do you know for a fact it has nothing to do with 11:42 17 it? 11:42 18 A. Because Steve talked to me about his 11:42 19 trip. 11:42 20 Q. Okay. What did he tell you? What did 11:42 21 he tell you the purpose of the trip was? 11:42 22 MR. GRENDI: Objection. Why are we talking 11:42 </p>
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<p>1 about a trip when the witness just said it has 11:42 2 nothing to do with this case? 11:42 3 MR. GREIM: Well, he said it doesn't. He was 11:42 4 about to tell us why it doesn't. 11:42 5 THE WITNESS: First of all, Steve didn't know 11:42 6 Miles. He never heard of Miles before this trip. I 11:42 7 mean during this during this trip. 11:42 8 He met with Miles on October 6th, I think I 11:42 9 believe of 2017. So he didn't know, and that meeting 11:42 10 was about economic nationalism. Wang Qishan lectured 11:43 11 him for the entire session of his meeting. That's 11:43 12 what Bannon told me. 11:43 13 BY MR. GREIM: 14 Q. Is that the extent of your knowledge 11:43 about the trip? 11:43 15 A. Correct. 11:43 16 Q. All right. Have you ever discussed the 11:43 trip with Guo Wengui? 11:43 17 A. No, because the meeting, you know, what 11:43 Steve and Miles, when we sit down, Steve told what 11:43 happened. 11:43 18 Q. Okay. I'm sorry. Steve told Miles what 11:43 </p>	<p>1 that I can show you here in a moment, but I just want 11:45 2 you to take a look at this and tell me whether, now 11:46 3 having looked through this document, you have ever 11:46 4 heard of it or seen it before. 11:46 5 A. Never heard, never seen this before. 11:46 6 Can I see the Chinese version? 11:46 7 Q. Yes. I'm going to play for you a 11:46 8 newscast with, I believe, the Mirror in which Mr. 11:46 9 Wengui discusses -- I'm sorry -- Mr. Guo discusses 11:46 10 the letter. I'm going to go ahead for our counsel 11:46 11 here and I'm going to go ahead and mark as Exhibit 6 11:46 12 a transcription and translation of that. Again, this 11:46 13 has been previously produced to counsel and the 11:47 14 translation is accompanied with an affidavit of the 11:47 15 translator, Jessica Ju. This is from 11:47 16 https://youtu.be/7qVmEsw_ZX8, and it was published on 11:47 17 January 18, 2018. 11:47 18 What I'm going to do, sir, is I'm going to try 11:47 19 to make sure you can see my screen, because the 11:47 20 newscast -- 11:47 21 [Video presentation.] 11:47 22 MR. GREIM: I'm pausing it. What I'm going 11:48 </p>
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<p>1 happened? 11:43 2 A. Steve, me, Miles, we have a dinner, 11:43 3 several dinners. So I think at the beginning, you 11:44 4 know, he mentioned about this trip. He described the 11:44 5 meeting with Wang Qishan. 11:44 6 Q. Are you aware of a letter that Mr. Guo 11:44 7 wrote to President Xi in August of 2017? 11:44 8 A. I didn't. 11:44 9 Q. Have you ever heard of that before? 11:44 10 A. No. 11:44 11 [Han Exhibit No. 5 was 11:44 12 marked for identification.] 11:45 13 BY MR. GREIM: 14 Q. I'm going to show you what we are 11:45 15 marking as Exhibit 5, and what I'm showing you here 11:45 16 is a certified translation that was filed in the New 11:45 17 York County Supreme Court in another matter, and this 11:45 18 purports to be a letter from Guo Wengui to the 11:45 19 Honorable Leader, parentheses "S". It starts with 11:45 20 "Greetings" and it's signed, Respectfully, s/Guo 11:45 21 Wengui, August 26, 2017. 11:45 22 Now, I've got an actual Chinese copy of this 11:45 </p>	<p>1 to do is move my computer closer to you without 11:48 2 wrecking the entire setup that we have here. 11:48 3 THE WITNESS: Yeah. Oh, that's the Chinese 11:48 4 version? 11:48 5 MR. GREIM: Yes, sir, but I just encourage 11:48 6 you to listen, and if there were even a way for you 11:48 7 to pause as you need to -- 11:48 8 THE WITNESS: Yeah. 11:48 9 MR. GREIM: -- I'll try to allow that. 11:48 10 THE WITNESS: Okay. 11:48 11 MR. GREIM: And what you may do is, if you 11:48 12 know how to work this -- 11:48 13 THE WITNESS: That's fine. I can listen. 11:48 14 MR. GREIM: Okay. 11:48 15 [Video presentation.] 11:49 16 THE WITNESS: This is a half an hour thing. 11:49 17 Are we going to go through everything? 11:49 18 [Mr. Greim gestures in the negative.] 11:50 19 [Continued video presentation.] 11:53 20 MR. GREIM: All right. I have stopped this 11:56 21 exactly at seven minutes and thirty seconds. As the 11:56 22 witness points out, this particular clip is a total 11:56 </p>

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<p>1 of about 23 minutes and eventually goes to 31:43. We 11:56 2 won't play the entire clip here, but we can if it's 11:56 3 necessary. 11:56 4 BY MR. GREIM: 11:56 5 Q. So my question to the witness, first of 11:56 6 all, is that -- what did you see, first of all, on 11:56 7 the video? 11:56 8 A. What did I see? 11:56 9 Q. Sure. 11:56 10 MR. GRENDI: I'll just object to line of 11:56 11 questioning. 11:56 12 THE WITNESS: Just, you know, it's his letter 11:56 13 to the Chinese leaders and he explains who he 11:56 14 addressed it to. 11:56 15 BY MR. GREIM: 11:56 16 Q. And who is interviewing Mr. Guo? 11:56 17 A. Chen Xiaoping. 11:57 18 Q. Who is that? 11:57 19 A. Chen Xiaoping is the host of Mirror Tv. 11:57 20 Q. This is the TV program you mentioned 11:57 21 earlier? 11:57 22 A. Correct. 11:57 </p>	<p>1 THE WITNESS: Just exactly the same letter, 11:58 2 just done into segments. 11:58 3 BY MR. GREIM: 11:58 4 Q. Okay. And so let me ask you again, now 11:58 5 that you've seen it in Chinese -- 11:58 6 A. Yeah. 11:58 7 Q. -- and you've heard Mr. Guo talking 11:58 8 about it, had you ever heard of this letter before 11:58 9 today? 11:58 10 MR. GAVENMAN: Objection, form. 11:58 11 THE WITNESS: No. This is the first time I 11:58 12 saw this video clip. I didn't know the letter. 11:58 13 BY MR. GREIM: 11:58 14 Q. Okay. Well, if we could go to the 11:58 15 English version -- 11:58 16 A. Yes. 11:58 17 Q. -- you'll see that the beginning of the 11:58 18 letter after the word "Greetings" says: "Thank you 11:58 19 very much for your hospitality to meet members of my 11:58 20 family and staff yesterday." 11:59 21 Do you see that? 11:59 22 A. Yes. 11:59 </p>
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<p>1 Q. All right. And do you recognize Mr. Guo 11:57 2 and Mr. Guo's voice answering his questions? 11:57 3 A. Yes. 11:57 4 Q. And did you hear Mr. Guo to ask the host 11:57 5 that the letter be put up on the screen? 11:57 6 A. Correct. 11:57 7 MR. GRENDI: Objection. 11:57 8 BY MR. GREIM: 11:57 9 Q. And did you see the letter? 11:57 10 A. Yes. 11:57 11 Q. How many pages did it have? 11:57 12 A. Four or five. Four. 11:57 13 Q. Were you able to read it in Chinese? 11:57 14 A. Yes. 11:57 15 Q. And then after the actual letter was 11:57 16 shown, did you see a transcription that followed 11:57 17 while some piano music played? 11:57 18 A. Yes. 11:57 19 Q. What were Chinese characters in the 11:57 20 transcription after the letter? 11:57 21 MR. GRENDI: Objection. 11:57 22 MR. GAVENMAN: Objection. 11:57 </p>	<p>1 MR. GAVENMAN: I'm just going to object to 11:59 2 the extent this is not an accurate translation, just 11:59 3 to that extent, but we can go on. 11:59 4 MR. GRENDI: Same objection. 11:59 5 BY MR. GREIM: 11:59 6 Q. Now, we can go back to Chinese text, if 11:59 7 you would like, sir, to take a look at the -- 11:59 8 A. Yeah. Let's go back and see exactly. I 11:59 9 think there is a mistranslation here. I can see at 11:59 10 least one error here, but that's the Chinese -- the 11:59 11 English version. It's the beginning of the letter, I 11:59 12 think. 12:00 13 Q. You're now looking at the beginning of 12:00 14 the letter? 12:00 15 A. Yeah. Can we enlarge this a little bit? 12:00 16 Q. I'm afraid we can't. 12:00 17 A. I can't read it. 12:00 18 Q. Let me see if I can, sir. 12:00 19 A. There it goes. 12:00 20 Q. And you can feel free to use my controls 12:00 21 on the my computer to move. We may have a few other 12:00 22 questions on other pages here. 12:00 </p>

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<p>1 [Witness peruses document.] 12:00</p> <p>2 THE WITNESS: Yeah. 12:00</p> <p>3 BY MR. GREIM: 12:01</p> <p>4 Q. So was there a mistranslation in the 12:01</p> <p>5 transcription that I showed you? 12:01</p> <p>6 A. Just for this part, no, for the first 12:01</p> <p>7 paragraph. 12:01</p> <p>8 Q. Okay. Now, are you aware of a -- other 12:01</p> <p>9 than the meeting that we talked about earlier in May, 12:01</p> <p>10 are you aware of another meeting between Mr. Guo and 12:01</p> <p>11 any Chinese officials? 12:01</p> <p>12 A. No. 12:01</p> <p>13 Q. Do you see under paragraph 1 of the 12:01</p> <p>14 English translation, under paragraph 1, Mr. Guo is 12:01</p> <p>15 making certain requests of the Chinese leaders? Are 12:01</p> <p>16 you aware of him having made such requests in or 12:01</p> <p>17 around August of 2017? 12:01</p> <p>18 MR. GRENDI: Objection. 12:01</p> <p>19 MR. GAVENMAN: Objection, form. 12:01</p> <p>20 THE WITNESS: I didn't know he made any 12:01</p> <p>21 requests, specific requests, like that, but I know 12:01</p> <p>22 there were -- he tried to negotiation -- tried to 12:02</p>	<p>1 translation. 12:03</p> <p>2 BY MR. GREIM: 12:03</p> <p>3 Q. Well, what -- which of those conditions, 12:03</p> <p>4 are any of the conditions inaccurate in the 12:03</p> <p>5 transcription? 12:03</p> <p>6 A. Yeah. Roughly, it's correct, but he's 12:03</p> <p>7 talking about like overseas, to stop overseas use the 12:03</p> <p>8 army. He uses a specific term, sui jin. Sui jin 12:03</p> <p>9 means -- how to translate? 12:03</p> <p>10 Sui jin is the Communist hired thugs or hired 12:03</p> <p>11 crowds that's suing him. So that was not translated 12:03</p> <p>12 accurately. 12:04</p> <p>13 Q. I see. So does that apply to the phrase 12:04</p> <p>14 that says "drop the illegal action that is being 12:04</p> <p>15 taken against me overseas"? 12:04</p> <p>16 A. Yeah, but he's specifically -- by those 12:04</p> <p>17 hired, you know, sui jin, army of Communist Party. 12:04</p> <p>18 Q. Let me take you to the first -- if you 12:04</p> <p>19 continue in that paragraph, there are some text in 12:04</p> <p>20 bold. It's in bold both in Chinese characters and in 12:04</p> <p>21 English translation. 12:04</p> <p>22 A. Yeah. 12:04</p>
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<p>1 A. Where is that? 12:05</p> <p>2 Q. It's about two sentences later? 12:05</p> <p>3 A. Here, in the English? 12:05</p> <p>4 Q. Oh, yes, in the English. I'm just going 12:05</p> <p>5 to point out to you. 12:05</p> <p>6 A. Okay. 12:05</p> <p>7 Q. "My public exposures of information 12:05</p> <p>8 before was done under coercion. My choice to perform 12:05</p> <p>9 publicly was not voluntary." 12:05</p> <p>10 Do you see that in the Chinese? 12:05</p> <p>11 A. Yeah. It's not a very accurate 12:05</p> <p>12 translation. 12:06</p> <p>13 Q. Okay. How would you, if you could -- 12:06</p> <p>14 what is inaccurate about it? 12:06</p> <p>15 MR. GAVENMAN: Objection to form. 12:06</p> <p>16 MR. GRENDI: Objection. 12:06</p> <p>17 THE WITNESS: Let's see. So he basically 12:06</p> <p>18 says they hold the entire situation, it's not alone I 12:06</p> <p>19 can decide and control, and it's involved with my -- 12:06</p> <p>20 the country I reside in and other relevant interests, 12:06</p> <p>21 stakeholders. 12:06</p> <p>22 BY MR. GREIM: 12:06</p>	<p>1 very end and then we're just about done with this, 12:07</p> <p>2 sir. 12:08</p> <p>3 A. All right. 12:08</p> <p>4 Q. If you go to page 5 of the 12:08</p> <p>5 transcription -- actually, I think it's really page 12:08</p> <p>6 3. Sorry. You'll see that there is a little six. 12:08</p> <p>7 A. Yeah. 12:08</p> <p>8 Q. It says "A few". 12:08</p> <p>9 A. Yes. 12:08</p> <p>10 Q. Actually, before we get there, it's 12:08</p> <p>11 really under five. I apologize. You'll see it says: 12:08</p> <p>12 "I will put our national interest first and I am 12:08</p> <p>13 willing to devote my life to protecting our nation's 12:08</p> <p>14 interest to defend Chairman Xi Jinping's value as our 12:08</p> <p>15 nation's core faith and make ultimate dedication of 12:08</p> <p>16 myself to safeguard Chairman Xi Jinping." 12:08</p> <p>17 Did I read that correctly? 12:08</p> <p>18 A. Yes, you read that correctly, but let me 12:08</p> <p>19 just see what's the Chinese version. 12:08</p> <p>20 Q. Absolutely. Let's go there. 12:08</p> <p>21 [Video presentation.] 12:09</p> <p>22 THE WITNESS: This is No. 5? 12:09</p>
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<p>1 Q. That actually wasn't the sentence I read 12:06</p> <p>2 to you, but I see that. 12:06</p> <p>3 A. Right. Right, but after that, he says, 12:06</p> <p>4 you know, like the whistle-blowing exposure before 12:06</p> <p>5 was forced and also like a reluctant choice. 12:07</p> <p>6 Q. I see. 12:07</p> <p>7 A. So that would be my understanding of the 12:07</p> <p>8 translation. 12:07</p> <p>9 Q. So instead of done under coercion and 12:07</p> <p>10 was not voluntary, you would say forced? 12:07</p> <p>11 A. Yes, because how you translate the whole 12:07</p> <p>12 paragraph, the context of the thing. 12:07</p> <p>13 Q. Did Mr. Guo ever tell you that he felt 12:07</p> <p>14 he was forced to engage in his whistle-blowing speech 12:07</p> <p>15 in the U.S.? 12:07</p> <p>16 MR. GRENDI: Objection. 12:07</p> <p>17 THE WITNESS: I don't think so, because it 12:07</p> <p>18 depends on, you know, how it's forced, forced by the 12:07</p> <p>19 situation, forced by the individual. He didn't 12:07</p> <p>20 specify that. 12:07</p> <p>21 BY MR. GREIM: 12:07</p> <p>22 Q. If you could go to -- let's go to the 12:07</p>	<p>1 BY MR. GREIM: 12:09</p> <p>2 Q. Yes, sir. Do we need to go to another 12:09</p> <p>3 page? 12:09</p> <p>4 A. No, no. This is the page. 12:09</p> <p>5 [Witness peruses document.] 12:09</p> <p>6 THE WITNESS: Yeah. I get it. 12:10</p> <p>7 BY MR. GREIM: 12:10</p> <p>8 Q. Is that an accurate translation? 12:10</p> <p>9 MR. GRENDI: Objection. 12:10</p> <p>10 THE WITNESS: It's not -- you know, I think 12:10</p> <p>11 it's exaggerated a little bit on the side of -- yeah. 12:10</p> <p>12 It's a different tone, yeah, different. The scale of 12:10</p> <p>13 emphasis, yeah, roughly correct. 12:10</p> <p>14 BY MR. GREIM: 12:10</p> <p>15 Q. Okay. I mean, the English translation 12:10</p> <p>16 ends with an exclamation point. Right? 12:10</p> <p>17 A. Right. Chinese also. 12:10</p> <p>18 Q. Chinese also, okay. So what is it in 12:10</p> <p>19 the English translation that you would change then? 12:10</p> <p>20 I want to make sure I understand precisely where you 12:10</p> <p>21 disagree with this translation. 12:10</p> <p>22 MR. GRENDI: Objection. 12:10</p>

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<p>1 THE WITNESS: Let's see I think it's the 12:10 2 tone. Yeah. It's not -- I mean, it's roughly 12:10 3 correct. 12:10 4 BY MR. GREIM: 12:10 5 Q. Okay. 12:10 6 A. That's my -- the tone seems to me more 12:10 7 weighted on, you know, how he's going to devote 12:11 8 everything. 12:11 9 Q. Do you have any doubt that Mr. Guo 12:11 10 actually sent this letter? 12:11 11 A. I have no idea if he did or not. 12:11 12 Q. Okay. Let me take you now to the final 12:11 13 part of this paragraph 6, and that may go into the 12:11 14 next page. Do we need to change yet? 12:11 15 A. No, not yet. Let me just see what you 12:11 16 want. 12:11 17 Q. So you see six says: "A few small 12:11 18 suggestions from the bottom of Wengui's heart." 12:11 19 A. Yeah. 12:11 20 Q. Then he has actually, A, B, C, D, E, F, 12:11 21 and G. 12:11 22 A. Correct. 12:11 </p>	<p>1 resources momentarily into best serving Chairman Xi 12:13 2 Jinping's Chinese Dream", exclamation point. 12:13 3 A. Yes. 12:13 4 Q. Is that fair? 12:13 5 A. Yes. 12:13 6 Q. And then under -- let's skip to "G". 12:13 7 A. "G"? 12:13 8 Q. Which might have to be the next page 12:13 9 now. 12:13 10 A. Yeah. 12:13 11 [Video presentation.] 12:13 12 THE WITNESS: Yes. 12:13 13 BY MR. GREIM: 12:14 14 Q. And the English translation is in bold 12:14 15 and italics. It says: "Assign me tasks to 12:14 16 accomplish in furtherance of our national interests 12:14 17 initiative and engage in Chairman Xi Jinping's global 12:14 18 strategy so that I can redeem myself by my good 12:14 19 service, demonstrating my patriotism and loyalty to 12:14 20 Chairman Xi Jinping." 12:14 21 Did I read that correctly? 12:14 22 A. This is number -- it should be number 12:14 </p>
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<p>1 Q. And so if you look under "A", he says: 12:11 2 "Give Wengui an opportunity to chant for our nation." 12:11 3 And then the translator says that they have 12:12 4 added Communist China. Do you see? 12:12 5 A. Yeah. 12:12 6 Q. That's not in the Chinese. Correct? 12:12 7 A. No. That's not in Chinese. 12:12 8 Q. Then he says: "In advocating our 12:12 9 nation's legal system solely for propagandizing 12:12 10 Chairman Xi Jinping's call for the Rule of Law in 12:12 11 China", exclamation point. 12:12 12 A. Right, but that's also -- this 12:12 13 translation is bad. It's not accurate. Yeah. It 12:12 14 is, you know, like advocating for nation's legal 12:12 15 system beauty. 12:12 16 Q. Okay. And does it -- 12:12 17 A. There's no for propaganda. You know, 12:12 18 like a -- yeah. There is that propaganda. Sorry. 12:12 19 Advocate, you can see advocate for Xi Jinping's Rule 12:12 20 of Law in Chinese. It's a matter of translation. 12:12 21 Q. Okay. And then if you look at "B": 12:13 22 "Can you consider to convert Wengui's influence and 12:13 </p>	<p>1 what? Let's see. 12:14 2 Q. "G", 6(g). 12:14 3 A. One, two, three, four, five, six, seven. 12:14 4 The last one? 12:14 5 Q. Correct. 12:14 6 A. Yeah. Yes. 12:14 7 Q. Is that an accurate translation? 12:15 8 A. Not quite. 12:15 9 Q. What is off in the translation? 12:15 10 A. I think he says let's redeem myself, 12:15 11 like let me correct my mistakes and perform, you 12:15 12 know, like contribute. Yeah. 12:15 13 Q. So other than -- so you would change 12:15 14 "redeem" to "correct my mistakes"? 12:15 15 A. Yeah. 12:15 16 Q. And will you have any change to good 12:15 17 service, demonstrating my patriotism and loyalty to 12:15 18 Chairman Xi Jinping? 12:15 19 A. That is -- it's not accurate 12:15 20 translation, because I want to use the translation, 12:16 21 direct translation, literal translation, use the 12:16 22 result to express my support of Xi and my patriots. 12:16 </p>

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1	Q. Very well. Okay. Now, have you ever	12:16	1	MR. GRENDI: Objection to form.	12:18
2	heard Guo Wengui express similar sentiments?	12:16	2	THE WITNESS: I don't specifically know that.	12:18
3	A. No.	12:16	3	BY MR. GREIM:	12:18
4	Q. And when you helped to set up the	12:16	4	Q. Did he do it after this?	12:18
5	meeting between Strategic Vision and Guo Wengui, you	12:16	5	MR. GRENDI: Objection.	12:18
6	were not aware of this letter?	12:16	6	MR. GAVENMAN: Objection.	12:18
7	A. No.	12:16	7	THE WITNESS: I think there's plenty he did	12:18
8	Q. Do you know whether Guo Wengui received	12:16	8	after that, but I just didn't follow whatever he	12:18
9	the specific instructions he was asking for in this	12:16	9	said.	12:18
10	letter?	12:16	10	BY MR. GREIM:	12:18
11	MR. GAVENMAN: Objection to form.	12:16	11	Q. And your testimony is that you have no	12:18
12	MR. GRENDI: Objection.	12:16	12	knowledge of any other contacts -- well, let me	12:18
13	THE WITNESS: No, but he explained what	12:16	13	strike that.	12:18
14	instructions he got from the video.	12:16	14	You have no knowledge of any contacts that Guo	12:18
15	BY MR. GREIM:	12:16	15	or anyone working on his behalf had with the Chinese	12:18
16	Q. Oh. Do you believe in the video, he	12:16	16	Government after August of 2017?	12:18
17	actually explains the instructions he did receive?	12:17	17	MR. GRENDI: Objection.	12:19
18	A. Yes. Yes. You have to give the	12:17	18	MR. GAVENMAN: Objection, form.	12:19
19	transcript of the entire thing so you would know what	12:17	19	THE WITNESS: August of 2017? No.	12:19
20	he's talking about.	12:17	20	BY MR. GREIM:	12:19
21	Q. Well, is this based on what you have	12:17	21	Q. And do you know that he did not have	12:19
22	heard or what you see later in the transcript?	12:17	22	contacts with the Chinese Government after August of	12:19
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1	A. I heard.	12:17	1	2017?	12:19
2	Q. Okay. So --	12:17	2	MR. GAVENMAN: Objection.	12:19
3	A. Just now.	12:17	3	MR. GRENDI: Objection.	12:19
4	Q. I'm sorry. Tell us. What did he say?	12:17	4	THE WITNESS: I don't have any knowledge	12:19
5	A. He said --	12:17	5	whether he has or have not.	12:19
6	MR. GRENDI: Objection. I just want to --	12:17	6	BY MR. GREIM:	12:19
7	hold on. I want to go the record. He didn't listen	12:17	7	Q. Do you know whether it's true that Mr.	12:19
8	to the whole video. So he's testifying as to what he	12:17	8	Guo has been unable to move money from Hong Kong	12:19
9	heard so far in the video.	12:17	9	after he began speaking out as a dissident?	12:19
10	MR. GREIM: I agree. I agree.	12:17	10	MR. GAVENMAN: Objection.	12:20
11	THE WITNESS: Yeah. Just the beginning part,	12:17	11	MR. GRENDI: Objection.	12:20
12	he specifically -- the interview -- the reporter	12:17	12	MR. GAVENMAN: Form and asked and answered,	12:20
13	asked him what instruction they give you. He	12:17	13	I'm fairly certain.	12:20
14	explained, basically, don't expose, you know, the	12:17	14	You can answer, but it's been asked before.	12:20
15	high-ranking government officials', you know,	12:17	15	THE WITNESS: Okay. I don't have that	12:20
16	corruption and don't use her Twitter, expose the	12:17	16	knowledge.	12:20
17	dirt.	12:18	17	BY MR. GREIM:	12:20
18	That's basically it. That's the instruction.	12:18	18	Q. Have you advised Mr. Guo on any	12:20
19	BY MR. GREIM:	12:18	19	statements that he or his attorney has made in the	12:20
20	Q. And do you know when Guo Wengui last	12:18	20	press about this case?	12:20
21	exposed dirt on a high-ranking public officials?	12:18	21	A. About this particular case, no.	12:20
22	MR. GAVENMAN: Objection.	12:18	22	MR. GRENDI: Objection.	12:20

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<p>1 THE WITNESS: And except at the very 12:20 2 beginning, I advised him not to go forward with the 12:20 3 lawsuit. 12:20 4 BY MR. GREIM: 12:20 5 Q. Okay. Let's forge ahead. The very -- 12:20 6 did there come a time when you had a meeting just 12:20 7 with French Wallop and Mike Waller -- 12:20 8 A. Uh-huh. 12:20 9 Q. -- before Mr. Guo was present? 12:20 10 A. I don't have recollection. 12:21 11 Q. Okay. Do you recall -- 12:21 12 A. We might. 12:21 13 Q. Okay. Well, do you recall having a 12:21 14 meeting with them in order to determine whether you 12:21 15 felt comfortable connecting Strategic Vision to Mr. 12:21 16 Guo? 12:21 17 A. I don't recall that, but I always 12:21 18 caution all the people I introduce to Miles and 12:21 19 including Hudson, that Miles, some of what he exposed 12:21 20 is verified. Some is not verified and comes from the 12:21 21 Chinese, you know, communist system and you never 12:21 22 know, you know, what to expect. 12:21 </p>	<p>1 A. Yeah. 12:23 2 Q. -- I'm really referring to either French 12:23 3 Wallop or Mike Waller. Okay? 12:23 4 A. Yes. 12:23 5 Q. So did you give them any other cautions 12:23 6 about Mr. Guo? 12:23 7 A. I don't recall. I probably did say 12:23 8 something, yeah, because as I said, I warned on both 12:23 9 sides to be cautious as they move forward. 12:23 10 Q. Because in October or November of 2017, 12:23 11 you had only known Mr. Guo for a few months. 12:23 12 Correct? 12:23 13 A. Correct. 12:23 14 Q. And at that time, did you have some 12:23 15 doubt about whether everything he had told you was 12:23 16 true? 12:23 17 MR. GRENDI: Objection to form. 12:23 18 MR. GAVENMAN: Objection. 12:23 19 THE WITNESS: I do have some doubt, but I 12:23 20 think what he's done, the whistle-blowing, is very 12:24 21 significant, is very disruptive to Chinese Communist 12:24 22 regime. So based on that, I was there to help. 12:24 </p>
Page 122	Page 124
<p>1 I did caution them. At the same time, I also 12:21 2 cautioned Miles. I have never deal with Mike French 12:22 3 in a business transaction. So I didn't know if they 12:22 4 are -- you know, they can do whatever they can do. 12:22 5 So I warned both sides. 12:22 6 Q. And just so the testimony is clear, at 12:22 7 the beginning of your answer, did you say that Mr. 12:22 8 Guo came from the Chinese Communist system? 12:22 9 MR. GRENDI: Objection. 12:22 10 MR. GAVENMAN: Objection. 12:22 11 THE WITNESS: Come from -- everybody in China 12:22 12 comes out of the rule, the system of the CCP. That's 12:22 13 my meaning. 12:22 14 BY MR. GREIM: 12:22 15 Q. Did you give Strategic Vision -- and by 12:22 16 the way, when I say Strategic Vision -- 12:22 17 A. I don't want to see your message. 12:22 18 Q. Oh, you're right. You get to see 12:23 19 everything here. 12:23 20 [Witness views computer screen.] 12:23 21 BY MR. GREIM: 12:23 22 Q. When I say Strategic Vision -- 12:23 </p>	<p>1 BY MR. GREIM: 12:24 2 Q. And that was your state of mind at the 12:24 3 time you introduced Mr. Guo to Strategic Vision? 12:24 4 A. Correct. 12:24 5 Q. Did you convey that -- did you convey 12:24 6 those thoughts to Strategic Vision? 12:24 7 MR. GRENDI: Objection to form. 12:24 8 MR. GAVENMAN: Objection. 12:24 9 THE WITNESS: I think I did, because I said 12:24 10 some of what he said is not verifiable. You cannot 12:24 11 verify it at the time and some, indeed, has been 12:24 12 verified like HNA. 12:24 13 BY MR. 12:24 14 Q. Did they include his attendance at the 12:24 15 Tieneman Square massacre? 12:24 16 MR. GRENDI: Objection. 12:24 17 MR. GAVENMAN: Objection, form, privilege, 12:24 18 we've established. He's not answering that question. 12:25 19 THE WITNESS: I'm not answering that 12:25 20 question, yeah. 12:25 21 BY MR. GREIM: 12:25 22 Q. Did you advise Strategic Vision that it 12:25 </p>

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1	should obtain a deposit from Mr. Guo?	12:25	1	think he read it, because his English was not good at	12:27
2	MR. GRENDI: Objection.	12:25	2	the time.	12:27
3	THE WITNESS: I don't recall that. I might.	12:25	3	Q. So you didn't translate it for him?	12:27
4	I might have.	12:25	4	A. No.	12:27
5	BY MR. GREIM:	12:25	5	Q. Do you recall what Strategic Vision's	12:27
6	Q. At that point, by, let's say, November	12:25	6	initial proposal was?	12:28
7	of 2017, were you aware of concerns with Mr. Guo not	12:25	7	A. I didn't remember, but I think mostly	12:28
8	paying everyone he had hired to do specific tasks?	12:25	8	it's how to help him, media strategy, communication	12:28
9	MR. GRENDI: Objection.	12:25	9	strategy, that sort of thing.	12:28
10	MR. GAVENMAN: Objection.	12:25	10	Q. Okay. Do you remember where that	12:28
11	THE WITNESS: No.	12:25	11	meeting was? I know your memory is not good of the	12:28
12	BY MR. GREIM:	12:25	12	very first meeting, but do you remember where you	12:28
13	Q. So other than your statement about Mr.	12:25	13	would have met French and Michael?	12:28
14	Guo, what did you -- what, if anything, did you tell	12:26	14	A. I don't know where that meeting, the	12:28
15	Strategic Vision about potential projects for Guo?	12:26	15	first meeting, I met with them, whether it was before	12:28
16	A. Say that again.	12:26	16	we go to New York or, you know, we met in New York.	12:28
17	Q. Let me just -- it was a confusing	12:26	17	So but definitely, the first -- the meeting we had, I	12:28
18	question.	12:26	18	remember is in New York, the apartment of Miles Kwok.	12:28
19	In your very first meeting with Strategic	12:26	19	Q. Was it around Thanksgiving?	12:29
20	Vision --	12:26	20	A. It's November, yeah, during the time. I	12:29
21	A. Yeah.	12:26	21	don't know if it's, you know, Thanksgiving or close	12:29
22	Q. -- what, if anything, did you tell	12:26	22	to Thanksgiving.	12:29
		Page 126			Page 128
1	Strategic Vision about projects that Guo needed done?	12:26	1	MR. GREIM: All right. It is now about	12:29
2	A. I don't remember exactly the first	12:26	2	12:30. Why don't we -- I know we just took a break	12:29
3	meeting, what we discussed. I think the idea come to	12:26	3	about an hour ago. So why don't we take another	12:29
4	me to investigate through some conventional way, that	12:26	4	break for lunch. Let's make it like 45 minutes and	12:29
5	was later, probably later on, not the first meeting.	12:26	5	then we'll come back and just march through the	12:29
6	The first meeting was focused on how they can help	12:27	6	documents.	12:29
7	the communication, the P.R., but I don't remember	12:27	7	Does that make sense?	12:29
8	exactly when, you know.	12:27	8	MR. GAVENMAN: Sounds good.	12:29
9	Q. Did Strategic Vision bring any documents	12:27	9	MR. GREIM: Okay. Very good.	12:29
10	to that first meeting?	12:27	10	VIDEOGRAPHER: Going off the record. The	12:29
11	A. Yes. There is a proposal that I	12:27	11	time is now 12:31 p.m.	12:29
12	obtained pre -- before the meeting.	12:27	12	[Whereupon, at 12:31 p.m., a lunch recess was	12:29
13	Q. Okay.	12:27	13	taken, to reconvene at 1:15 p.m. this same day.]	12:29
14	A. To offer their services, specific	12:27	14		
15	services.	12:27	15		
16	Q. Did you share that proposal with Mr.	12:27	16		
17	Guo?	12:27	17		
18	A. I think I did.	12:27	18		
19	Q. Did you share it with Mr. Gertz?	12:27	19		
20	A. It had come from Gertz.	12:27	20		
21	Q. Okay.	12:27	21		
22	A. And I forwarded it to Miles. I don't	12:27	22		

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1	A F T E R N O O N S E S S I O N	12:29	1	not being forced to leave and lay out his long-term objectives of guiding historic change in his homeland. Did I read that right?	13:23
2	VIDEOGRAPHER: We are back on the record.	13:20	2		13:23
3	The time is now 1:22 p.m.	13:20	3		13:23
4	MR. GREIM: Let the record reflect the thumb	13:20	4	A. Yes.	13:23
5	drive from which I played two video clips that the	13:21	5	Q. And are those the objectives that, even	13:23
6	witness viewed has been marked as Han Exhibit 7.	13:21	6	apart from the Strategic Vision work, you were trying	13:23
7	We'll just keep this with the original exhibits, for	13:21	7	to advise Mr. Guo on?	13:23
8	now at least.	13:21	8	MR. GRENDI: Objection.	13:23
9	[Han Exhibit No. 7 was	13:21	9	MR. GAVENMAN: Objection.	13:23
10	marked for identification.]	13:21	10	THE WITNESS: Yes.	13:23
11	FURTHER EXAMINATION BY COUNSEL FOR	13:21	11	BY MR. GREIM:	13:23
12	DEFENDANT/COUNTERCLAIM PLAINTIFF	13:21	12	Q. Now, did you translate for Mr. Guo?	13:23
13	BY MR. GREIM:	13:21	13	A. I don't think so. I gave him a rough	13:24
14	Q. Okay. So, Mr. Han, earlier, we talked	13:21	14	idea about what was proposed.	13:24
15	about a proposal that Strategic Vision had given to	13:21	15	Q. And would you agree with me that most of	13:24
16	Mr. Gertz, who then gave to you. Do you recall that?	13:21	16	this document deals with, for lack of a better word,	13:24
17	A. Yes.	13:21	17	public relations?	13:24
18	MR. GREIM: I'm going to show you what we are	13:21	18	A. Pretty much, yes.	13:24
19	marking as Exhibit 8.	13:21	19	Q. Or maybe, better, it would be public	13:24
20	[Han Exhibit No. 8 was	13:21	20	communications?	13:24
21	marked for identification.]	13:21	21	A. I think it's public image. Also, if you	13:24
22	MR. GREIM: I'm going to ask you take a look	13:21	22	look at the layout, help him to accomplish his	13:24
		Page 130			Page 132
1	at that and see if you recognize this document. It's	13:21	1	objectives here, and I would say my perception at the	13:24
2	Bates labeled SVU77 to 79, and the top of the page	13:21	2	beginning is the P.R., you know, strategic P.R.	13:24
3	says "Vision".	13:22	3	Q. What was Mr. Guo's reaction after you	13:24
4	There's also handwriting in the upper	13:22	4	summarized this?	13:24
5	right-hand corner that says "1st Mtg w/Guo".	13:22	5	A. I don't remember specifically what he	13:24
6	[Witness peruses exhibit.]	13:22	6	reacted to it, how he reacted to it. I have no	13:25
7	MR. GRENDI: Can you repeat what the question	13:22	7	recollection.	13:25
8	is?	13:22	8	Q. Well, after you reviewed it, what was	13:25
9	THE WITNESS: Did you ask me a question?	13:22	9	your reaction to it?	13:25
10	BY MR. GREIM:	13:22	10	A. I think this is, you know, for me, he	13:25
11	Q. All right. So, Mr. -- do you recognize	13:22	11	needs someone to steer him through this media world,	13:25
12	this document, Mr. Han?	13:22	12	focused world. I think he needs someone to help him.	13:25
13	A. Yeah. It looks like the original. Yes.	13:23	13	You know, that's just my understanding. I	13:25
14	Q. And I'll just ask you, if look at the	13:23	14	think this is perfect for him as well.	13:25
15	very first paragraph, it says: "This is a vision	13:23	15	Q. At this point in time, did Mr. Guo have	13:25
16	from Mr. G."	13:23	16	Guo Media yet?	13:25
17	Is that Mr. Guo?	13:23	17	A. No.	13:25
18	A. Yes.	13:23	18	MR. GRENDI: Objection.	13:25
19	Q. "To remain safely in this country and	13:23	19	MR. GAVENMAN: Objection.	13:25
20	accomplish his mission back home."	13:23	20	THE WITNESS: No.	13:25
21	And then it presents a three-year roadmap to	13:23	21	BY MR. GREIM:	13:25
22	enable him to accomplish his immediate objectives of	13:23	22	Q. Have you heard of something called Guo	13:25

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<p>1 Media? 13:25</p> <p>2 A. No. 13:25</p> <p>3 Q. Oh. You've never heard of that? 13:25</p> <p>4 A. I heard of Guo Media, yeah. 13:26</p> <p>5 Q. What is it? 13:26</p> <p>6 A. That's his, Miles, his media platform, I 13:26</p> <p>7 think probably set up in 2018. 13:26</p> <p>8 Q. Would it surprise you to learn that Mr. 13:26</p> <p>9 Guo doesn't know who owns Guo Media? 13:26</p> <p>10 MR. GAVENMAN: Objection. 13:26</p> <p>11 MR. GRENDI: Objection. 13:26</p> <p>12 THE WITNESS: Nothing surprises me anymore. 13:26</p> <p>13 MR. GREIM: All right. I'm now going to hand 13:26</p> <p>14 you what's marked as Han Exhibit 9. 13:26</p> <p>15 [Han Exhibit No. 9 was 13:26</p> <p>16 marked for identification.] 13:26</p> <p>17 MR. GREIM: Sorry, guys. I'm just handing 13:26</p> <p>18 them over across for your own internal distribution. 13:26</p> <p>19 MR. GRENDI: That's fine. 13:26</p> <p>20 MR. GREIM: You'll see this is a four-page 13:26</p> <p>21 document Bates labeled SVUS000080 to 83, and it says 13:26</p> <p>22 "Three-Year Timeline at the top. Please take a 13:27</p>	<p>1 A. Yes. 13:29</p> <p>2 Q. And then it mentions a Washington 13:29</p> <p>3 residence to show purpose and power and provide 13:29</p> <p>4 hospitality? 13:29</p> <p>5 A. Yes. 13:29</p> <p>6 Q. Now, do you recall being involved in 13:29</p> <p>7 discussions between Strategic Vision and Mr. Guo 13:29</p> <p>8 about Washington, a Washington residence? 13:29</p> <p>9 A. I think so. I remember that. 13:29</p> <p>10 Q. And do you recall, in fact, Mr. Guo 13:29</p> <p>11 talking to Strategic Vision about real estate 13:29</p> <p>12 purchases both in Washington and in New York? 13:29</p> <p>13 MR. GRENDI: Objection. 13:29</p> <p>14 THE WITNESS: Yes. I think so. 13:29</p> <p>15 BY MR. GREIM: 13:29</p> <p>16 Q. For example, do you recall that they 13:29</p> <p>17 discussed even buying the former home of David 13:29</p> <p>18 Rockefeller in New York? 13:29</p> <p>19 A. I didn't remember who initiated it, but 13:30</p> <p>20 I think there is such a discussion. 13:30</p> <p>21 Q. And were the discussions about real 13:30</p> <p>22 estate and offices mixed in with the discussions 13:30</p>
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<p>1 second to review it, Mr. Han. 13:27</p> <p>2 [Witness peruses exhibit.] 13:27</p> <p>3 THE WITNESS: Yeah. 13:28</p> <p>4 BY MR. GREIM: 13:28</p> <p>5 Q. Have you seen this document before? 13:28</p> <p>6 A. I might have. I have some recollection, 13:28</p> <p>7 but it's not as clear as this one. 13:28</p> <p>8 Q. Well, if you look at the strategic 13:28</p> <p>9 objectives in the very beginning, the five bullet 13:28</p> <p>10 points, while there are five bullet points, do they 13:28</p> <p>11 seem similar to the objectives identified in Exhibit 13:28</p> <p>12 8? 13:28</p> <p>13 MR. GRENDI: Objection. 13:28</p> <p>14 MR. GAVENMAN: Objection. 13:29</p> <p>15 THE WITNESS: Yeah. 13:29</p> <p>16 BY MR. GREIM: 13:29</p> <p>17 Q. And you'll see down under "Personal 13:29</p> <p>18 Presence", it says: "Create a personal presence in 13:29</p> <p>19 Washington." 13:29</p> <p>20 And then it goes on. Do you see that? 13:29</p> <p>21 A. Yes. 13:29</p> <p>22 Q. On the very first page? 13:29</p>	<p>1 about public campaign? 13:30</p> <p>2 MR. GAVENMAN: Objection, form. 13:30</p> <p>3 MR. GRENDI: Objection. 13:30</p> <p>4 THE WITNESS: Yeah. It's hard for me to 13:30</p> <p>5 remember exactly. I think maybe they were separate 13:30</p> <p>6 times or they were all together, yeah. Because it's 13:30</p> <p>7 part of the package, it might have yeah, more likely. 13:30</p> <p>8 BY MR. GREIM: 13:30</p> <p>9 Q. Okay. So they were discussed at the 13:30</p> <p>10 same time? 13:30</p> <p>11 MR. GRENDI: Objection. 13:30</p> <p>12 THE WITNESS: You know, sometimes when you 13:30</p> <p>13 talk about real estate, I think they're purely 13:30</p> <p>14 focused on real estate and not mentioned about some 13:30</p> <p>15 other part. I mean, just sometimes, that might be 13:30</p> <p>16 mixed. So I don't recall specific events. 13:30</p> <p>17 BY MR. GREIM: 13:31</p> <p>18 Q. It's hard to generalize? 13:31</p> <p>19 A. Correct. 13:31</p> <p>20 Q. Okay. Now, if you notice, in these four 13:31</p> <p>21 pages, there's still no discussion of a research 13:31</p> <p>22 project. Do you agree with me? 13:31</p>
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<p>1 A. Correct. 13:31</p> <p>2 Q. So let me ask you do you recall when in 13:31</p> <p>3 these discussions a research project actually began 13:31</p> <p>4 to be discussed? 13:31</p> <p>5 A. I didn't remember, but I know for a fact 13:31</p> <p>6 I was the one who talked Miles into this. I 13:31</p> <p>7 discussed with Mike and French to initiate this 13:31</p> <p>8 research project. 13:31</p> <p>9 Q. So I'm going to make sure I understand 13:31</p> <p>10 your testimony. 13:31</p> <p>11 A. Yes. 13:31</p> <p>12 Q. You -- did the research -- was the 13:31</p> <p>13 research project discussed between you and French and 13:32</p> <p>14 Mike before it was discussed with Mr. Guo? 13:32</p> <p>15 A. I didn't remember -- 13:32</p> <p>16 MR. GAVENMAN: Form. 13:32</p> <p>17 THE WITNESS: -- which comes first, but I 13:32</p> <p>18 come up with the idea, I believe to continue to 13:32</p> <p>19 disrupt the Communist regime, we need sustainable 13:32</p> <p>20 fact-based, evidence-based exposure of Chinese 13:32</p> <p>21 corruption. So I thought, you know, this project 13:32</p> <p>22 could fill into that and I discussed with -- I don't 13:32</p>	<p>1 A. No. It was purely my responsibility. 13:34</p> <p>2 Q. So do you know where -- well, let me 13:34</p> <p>3 back up. 13:34</p> <p>4 Do you understand that the initial research 13:34</p> <p>5 was to occur on a set of 15 names? 13:34</p> <p>6 A. That was the nature, I think, 13:34</p> <p>7 originally. I don't know what names would be will. 13:34</p> <p>8 Q. It was more amorphous at the beginning? 13:34</p> <p>9 A. Correct. 13:34</p> <p>10 MR. GRENDI: Objection. 13:34</p> <p>11 MR. GREIM: Well, let's see. I'm going to 13:34</p> <p>12 now show you what we're going to mark as Exhibit 10. 13:34</p> <p>13 [Han Exhibit No. 10 was 13:34</p> <p>14 marked for identification.] 13:34</p> <p>15 MR. GREIM: Wait a minute. This is a set of 13:35</p> <p>16 texts involving you, and I see -- let me make sure I 13:35</p> <p>17 didn't -- 13:35</p> <p>18 MR. GRENDI: You've got notes on one of them? 13:35</p> <p>19 MR. GREIM: I thought I did. Maybe not. 13:35</p> <p>20 Maybe I don't. 13:35</p> <p>21 MR. GRENDI: Just for the record, this is the 13:35</p> <p>22 document you produced to me last night, you produced 13:35</p>
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<p>1 know who I discussed first, because I didn't know 13:32</p> <p>2 there -- first, I think maybe I discussed with Mike 13:32</p> <p>3 and French whether they have the capability to do 13:32</p> <p>4 this, because in our conversation about these two 13:32</p> <p>5 projects or, I mean, these two proposals, I 13:32</p> <p>6 mentioned, I asked -- you know, they talked about 13:33</p> <p>7 their accreditation for doing stuff for government, 13:33</p> <p>8 for contracts, for some other issues. I felt maybe I 13:33</p> <p>9 asked them whether they have the capability to do 13:33</p> <p>10 this type of research, and they gave me -- you know, 13:33</p> <p>11 they confirmed that they could have. 13:33</p> <p>12 So I went back to Miles and said why don't we 13:33</p> <p>13 expand this proposal, do some research on those 13:33</p> <p>14 corrupt officials; once we have solid evidence, we 13:33</p> <p>15 can expose them. So that's how it started. 13:33</p> <p>16 Q. Now, when you made this proposal to Mr. 13:33</p> <p>17 Guo, did you have in mind yet which officials should 13:33</p> <p>18 be targeted? 13:33</p> <p>19 A. No, but I was -- mainly, I think we 13:33</p> <p>20 understand the top officials. 13:33</p> <p>21 Q. Okay. By the way, did Mr. Gertz play a 13:34</p> <p>22 role in coming up with the idea of research? 13:34</p>	<p>1 to Eastern Profit last night? 13:35</p> <p>2 THE WITNESS: Correct. This is a -- these 13:35</p> <p>3 are Bates numbered SVUS001842 to 1903 and they began 13:35</p> <p>4 in November 12, 2017 and they go to July 15, 2018. 13:36</p> <p>5 MR. GAVENMAN: Do you have a copy for me? 13:36</p> <p>6 MR. GREIM: Unfortunately, I only have three 13:36</p> <p>7 copies. I was thinking there was something wrong 13:36</p> <p>8 here. So if you don't mind, if you guys can share. 13:36</p> <p>9 I'm sorry. I'm missing one copy of that set. 13:36</p> <p>10 I hope that's not going to be the case for -- I've 13:36</p> <p>11 got other -- for some reason, we're missing one copy. 13:36</p> <p>12 I know what happened. I know what happened. 13:36</p> <p>13 [Discussion held off the record.] 13:37</p> <p>14 MR. GREIM: This is the only one like this. 13:37</p> <p>15 So I'm sorry, everybody. 13:37</p> <p>16 BY MR. GREIM: 13:37</p> <p>17 Q. Okay. So I will represent to you that 13:37</p> <p>18 this is a compendium of your texts with French Wallop 13:37</p> <p>19 and you'll see that they begin on November 12th. 13:37</p> <p>20 A. Yes. 13:37</p> <p>21 Q. My question for you, by the way, os did 13:37</p> <p>22 you first meet French at lunch at her home with Bill 13:37</p>

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<p>1 Gertz before Mr. Waller was there? Do you recall 13:38 2 that? 13:38 3 A. I don't. 13:38 4 Q. Okay. Well, you'll see that you are 13:38 5 writing to her on -- in the morning of the 12th and 13:38 6 you say: "Hi, French. Great meeting you. I talked 13:38 7 with Miles and he's eager to meet you. He wants to 13:38 8 invite you to Mar a Lago now, but I think it's better 13:38 9 to wait until I come back from Japan." 13:38 10 And then you're proposing a meeting on the 13:38 11 following week, on November the 19th. Do you see 13:38 12 that? 13:38 13 A. Right. 13:38 14 MR. GRENDI: Objection. 13:38 15 BY MR. GREIM: 13:38 16 Q. And you mention real estate. Correct? 13:38 17 A. Um-hum. 13:38 18 MR. GRENDI: Objection. 13:38 19 BY MR. GREIM: 13:38 20 Q. And you say: "His priority is the 13:38 21 building opposite the Treasury." 13:38 22 A. Um-hum. 13:38 </p>	<p>1 Wallop there is asking that the lunch be pushed back 13:39 2 to one? 13:40 3 A. Um-hum. 13:40 4 Q. I'm sorry. I'm sorry. I take that 13:40 5 back. You see that you're asking that the lunch be 13:40 6 pushed back because Bannon wants an urgent meeting at 13:40 7 11:30? 13:40 8 A. Yes. 13:40 9 Q. And by the way, was it common around 13:40 10 this time for Bannon to have, you know, meetings with 13:40 11 Mr. Guo? 13:40 12 MR. GAVENMAN: Objection. 13:40 13 MR. GRENDI: Objection. 13:40 14 THE WITNESS: Say that again. 13:40 15 BY MR. GREIM: 13:40 16 Q. Was it common around this time for 13:40 17 Bannon to have meetings with Mr. Guo? 13:40 18 MR. GAVENMAN: Objection. 13:40 19 MR. GRENDI: Objection. 13:40 20 THE WITNESS: Common? What do you mean, 13:40 21 common? 13:40 22 BY MR. GREIM: 13:40 </p>
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<p>1 Q. Okay. So by this point, do you believe 13:38 2 you at least met French Wallop? 13:38 3 A. Yeah. I might have. 13:38 4 Q. And you already talked to Mr. Guo about 13:38 5 her? 13:38 6 A. Yes. 13:38 7 Q. Let's forge ahead here. Then you see he 13:38 8 she wrote you back, your report back about Japan. 13:39 9 You say: "Steve Bannon stirred up things here. I am 13:39 10 happy." 13:39 11 Did I read that right? 13:39 12 A. Yes. 13:39 13 Q. Let's continue marching on, and if you 13:39 14 look at around November 20th, do you see that you're 13:39 15 setting -- 13:39 16 A. Where is the 20th? 13:39 17 Q. Oh. It's SVUS001844. 13:39 18 A. 44? 13:39 19 Q. Um-hum. You got ahead of us a little 13:39 20 bit there. 13:39 21 A. Yes. 13:39 22 Q. All right. So do you see that French 13:39 </p>	<p>1 Q. Was it a -- 13:40 2 A. Common practice? 13:40 3 Q. Yeah. Did it happen on a regular basis? 13:40 4 A. No, but Steve Bannon is very 13:40 5 unpredictable. His schedule is always messed up. 13:40 6 Always, we have to accommodate him. So that's 13:40 7 common. 13:40 8 Q. I see. If you go on now to page 45, 13:40 9 you'll see that Ms. Wallop asked that you not 13:40 10 disclose their identities to Mr. Bannon. 13:41 11 A. Correct. 13:41 12 Q. And you say, in fact, Mr. Guo does not 13:41 13 know her name yet. 13:41 14 A. Correct. 13:41 15 Q. And does that sound right, that you did 13:41 16 not disclose her name? 13:41 17 A. I didn't, yeah, because French asked me 13:41 18 not to mention their names at all. At the early 13:41 19 stage, I didn't. Steve Bannon even didn't know they 13:41 20 were going to be in that meeting at one o'clock. 13:41 21 Q. Okay. Very good. If you -- let's flip 13:41 22 ahead now to 1852. 13:41 </p>

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1 A. 52? 13:41	1 A. I think so, but -- yeah. I just don't 13:44
2 Q. Um-hum. We're now into December 3rd. 13:41	2 remember. 13:44
3 A. Yes. 13:41	3 Q. By the way, do people drink alcohol when 13:44
4 Q. Do you see that you are being sent by 13:41	meals were served when they met? 13:44
5 Ms. Wallop, it looks like, a Hotel Washington 13:42	5 A. Sometimes they do. 13:44
6 property? 13:42	6 MR. GAVENMAN: Objection, form. 13:44
7 A. Um-hum. 13:42	7 THE WITNESS: Sometimes they don't. Steve, I 13:44
8 Q. Do you remember discussing that 13:42	8 think Steve didn't want to drink. 13:44
9 property? 13:42	9 BY MR. GREIM: 13:44
10 A. No. 13:42	10 Q. Forget about -- I'm sorry. I don't mean 13:44
11 Q. All right. 13:42	11 about Steve Bannon. I mean -- 13:45
12 A. There's just so many properties being 13:42	12 A. In general? 13:45
13 discussed. 13:42	13 Q. -- when Strategic Vision met with Mr. 13:45
14 Q. Okay. Do you remember at this time -- I 13:42	14 Guo. 13:45
15 know there's not a lot of detail in these texts, but 13:43	15 MR. GAVENMAN: Objection. 13:45
16 do you remember whether the idea of a research 13:43	16 THE WITNESS: I think I remember there was 13:45
17 project had begun to be discussed by early December? 13:43	17 served alcohol, wine. 13:45
18 A. I don't think so, not in this meeting. 13:43	18 BY MR. GREIM: 13:45
19 Q. Okay. 13:43	19 Q. Okay. Did Mr. Guo have alcohol in these 13:45
20 A. Because we just set up a preliminary 13:43	20 meetings? 13:45
21 meeting, first meeting. 13:43	21 MR. GAVENMAN: Objection. 13:45
22 Q. Okay. And did it appear to you based on 13:43	22 THE WITNESS: He had some. 13:45
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1 the earlier text that maybe the very initial meeting, 13:43	1 BY MR. GREIM: 13:45
2 at least involving you and Strategic Vision, would 13:43	2 Q. What do you remember being discussed at 13:45
3 have been around Thanksgiving, in late November? 13:43	3 the very first meeting? 13:45
4 A. Yeah. About that time, yeah. I just 13:43	4 A. Very little. I think it was more around 13:45
5 don't know exactly. I would say -- did I mention 13:43	5 like the projects here, the vision stuff. 13:45
6 here 17, that Bannon meeting? That's the date they 13:43	6 Q. If you could skip to page 1854. 13:45
7 first met, I think. 13:43	7 A. 54? 13:45
8 Remember here, where it says Bannon had a 13:43	8 Q. Yeah. Actually, it's a few pages back 13:45
9 meeting at 11:30, that pushed back to one o'clock? 13:43	9 from where we were. I'm just trying to pin down 13:45
10 Q. Oh, right. 13:44	10 other dates of meetings. 13:45
11 A. So that day should be their first 13:44	11 A. Okay. 13:45
12 meeting. 13:44	12 Q. And it looks like there's going to be a 13:45
13 Q. I see. So does it look to you like that 13:44	13 meeting that day in New York City. 13:46
14 was November 20th? 13:44	14 A. On December 9? 13:46
15 A. Yes. So that's the first meeting they 13:44	15 Q. Correct. 13:46
16 actually met in person. 13:44	16 A. Um-hum. 13:46
17 Q. And you were there for that meeting? 13:44	17 Q. So do you believe -- this is clearly the 13:46
18 A. Yes. I was there with Steve Bannon and 13:44	18 second meeting, maybe the third meeting. Do you 13:46
19 then with them. 13:44	19 recall? 13:46
20 Q. Then after Bannon left, they came in? 13:44	20 MR. GRENDI: Objection. 13:46
21 A. Yes. 13:44	21 THE WITNESS: That, I don't remember exactly. 13:46
22 Q. Was a meal served? 13:44	22 The first, this is definitely not the first, but I 13:46
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<p>1 don't know if it's the second or third or fourth. 13:46</p> <p>2 That, I'm not sure. 13:46</p> <p>3 BY MR. GREIM: 13:46</p> <p>4 Q. By the way, does Ms. Wallop tend to use 13:46</p> <p>5 emoticons in her text? 13:46</p> <p>6 A. Say that again. 13:46</p> <p>7 Q. Does Ms. Wallop tend to use emoticons in 13:46</p> <p>8 her texts? 13:46</p> <p>9 A. Emoticons is like an emoji? 13:46</p> <p>10 Q. Emojis, yes. 13:46</p> <p>11 Emoticons, is that even a word? I think I 13:46</p> <p>12 meant emojis. I don't even know what an emoticon is. 13:46</p> <p>13 A. Yeah. 13:46</p> <p>14 Q. Okay. If you see -- now let's go ahead 13:46</p> <p>15 now and turn to 1858. 13:47</p> <p>16 A. 58. 13:47</p> <p>17 Q. And December 16th, there's the long 13:47</p> <p>18 series of texts that runs from the 16th to the 17th. 13:47</p> <p>19 You're advising that you landed back from a trip and 13:47</p> <p>20 there's a -- do you see in green? Is that commentary 13:47</p> <p>21 from Ms. Wallop? 13:47</p> <p>22 A. Yeah. 13:47</p>	<p>1 Q. Okay. So you don't remember checking 13:49</p> <p>2 names, checking other contacts that she provided to 13:49</p> <p>3 Mr. Guo? 13:49</p> <p>4 A. No. 13:49</p> <p>5 Q. You don't? 13:49</p> <p>6 A. No. 13:49</p> <p>7 Q. Do you know if Mr. Guo, if he checked 13:49</p> <p>8 the names? 13:49</p> <p>9 A. I have no idea. 13:49</p> <p>10 Q. But does this indicate to you that as of 13:49</p> <p>11 mid-December, the parties are still very much in 13:49</p> <p>12 discussions? 13:49</p> <p>13 A. Correct. 13:49</p> <p>14 Q. Okay. 13:49</p> <p>15 MR. GRENDI: For the record, just wait for 13:49</p> <p>16 him to finish the question. 13:49</p> <p>17 THE WITNESS: Okay. 13:49</p> <p>18 BY MR. GREIM: 13:50</p> <p>19 Q. On the next page, in white, you respond 13:50</p> <p>20 to this text from Ms. Wallop. She asked how your day 13:50</p> <p>21 went and you say "not good". 13:50</p> <p>22 A. Yes. 13:50</p>
<p style="text-align: center;">Page 150</p> <p>1 Q. Okay. Let's skip ahead. Do you see on 13:47</p> <p>2 the next page -- this is now 1859 -- at the top, Ms. 13:47</p> <p>3 Wallop says: "By the way, when your M asked for 13:47</p> <p>4 names elsewhere, I gave him a mini list, not the real 13:48</p> <p>5 list." 13:48</p> <p>6 A. We're on 58? 13:48</p> <p>7 Q. I'm sorry. We're on 59 now. We moved, 13:48</p> <p>8 the same text. 13:48</p> <p>9 A. "By the way". Okay. Yeah. 13:48</p> <p>10 [Witness peruses exhibit.] 13:48</p> <p>11 BY MR. GREIM: 13:48</p> <p>12 Q. Do you know whether you or Mr. Guo ever 13:48</p> <p>13 followed up to check with any of these contacts? 13:48</p> <p>14 MR. GAVENMAN: Objection, form. 13:48</p> <p>15 THE WITNESS: I have no idea. 13:48</p> <p>16 [Interruption.] 13:48</p> <p>17 BY MR. GREIM: 13:48</p> <p>18 Q. My question was -- well, first of all, 13:49</p> <p>19 let's back up. 13:49</p> <p>20 Do you remember getting a list of references 13:49</p> <p>21 from French Wallop? 13:49</p> <p>22 A. No. 13:49</p>	<p style="text-align: center;">Page 152</p> <p>1 Q. What -- I don't understand. What is -- 13:50</p> <p>2 what are you talking about in that text, if you can 13:50</p> <p>3 recall? 13:50</p> <p>4 A. Yeah. I didn't know exactly what was -- 13:50</p> <p>5 I think I had a fight with Steve Bannon, but I didn't 13:50</p> <p>6 know -- I didn't remember exactly what it was about. 13:50</p> <p>7 Q. Okay. Let's continue on with the string 13:50</p> <p>8 here. You see now, moving into page 1861 from 1860, 13:50</p> <p>9 we are now under the heading December 18, 2017 and 13:51</p> <p>10 Ms. Wallop says: "Safe journey back, please." 13:51</p> <p>11 And you respond: "Great meeting with our 13:51</p> <p>12 friend. He is coming in two weeks to Washington." 13:51</p> <p>13 Do you see that? 13:51</p> <p>14 A. Yes. 13:51</p> <p>15 Q. Do you know who you were referring to 13:51</p> <p>16 there? 13:51</p> <p>17 A. I think it's, perhaps, Miles. I'm just 13:51</p> <p>18 speculating. Maybe he came to Washington to look at 13:51</p> <p>19 houses. 13:51</p> <p>20 Q. Okay. Did he come to Washington at some 13:51</p> <p>21 point to look at houses? 13:51</p> <p>22 A. I think he did, yes. At least I 13:51</p>

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1 remember once.	13:51	1 A. Yes.	13:54
2 Q. Okay. It looks like on the 19th, the	13:51	2 Q. French Wallop says: "Hi there. Were	13:54
3 discussion continues here. She says: "Just checked	13:52	3 you able to set a time to visit New York? I know you	13:54
4 with M and after three is fine for him as well."	13:52	4 will let us know as the conversation unfolds."	13:54
5 On the 20th, she checks again. Do you recall	13:52	5 And then if you continue to page 1864, there's	13:54
6 having another meeting, setting up another meeting	13:52	6 your response. You say: "Not yet. He is	13:54
7 with Mr. Guo and Wallop and Waller? If you need to	13:52	7 incommunicado."	13:54
8 page forward or backward in this to help yourself,	13:52	8 Then you say: "Our Japan friend arrives on	13:54
9 please do.	13:52	9 the 2nd."	13:54
10 A. Page 4? Oh. I think that trip, most	13:52	10 Do you see that?	13:55
11 likely, was looking for real estate in Washington.	13:52	11 A. Yes.	13:55
12 Q. Let's move to December 21.	13:53	12 Q. So was there a time in mid-December when	13:55
13 A. 21, okay.	13:53	13 Mr. Guo sort of stopped conferring with you about	13:55
14 Q. There, you say: "Our friend from Tokyo	13:53	14 this matter?	13:55
15 wants to know when is earliest he can come to meet."	13:53	15 MR. GAVENMAN: Objection, form.	13:55
16 A. Wants to know when is the earliest that	13:53	16 MR. GRENDI: Objection.	13:55
17 he can come to meet.	13:53	17 THE WITNESS: I don't think specifically on	13:55
18 Q. Is this referring to Mr. Guo or a	13:53	18 this matter. Just he's not reachable at the time.	13:55
19 different person?	13:53	19 BY MR. GREIM:	13:55
20 A. It's a different person.	13:53	20 Q. Okay. If you go down to December 24th,	13:55
21 Q. So were you working with Strategic	13:53	21 you have another followup to Ms. Wallop. You say:	13:55
22 Vision on a different potential client?	13:53	22 "I talked with him and he says he wants to do it, but	13:55
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1 A. Yes.	13:53	1 would like to put a clause in the contract which says	13:55
2 Q. And might that have been the person that	13:53	2 if you failed to provide the deliverables as defined	13:55
3 you're referring to back on the previous page, 1862?	13:53	3 in the scope, you should return the deposit. What do	13:55
4 A. 1862?	13:53	4 you think?"	13:55
5 MR. GRENDI: Objection.	13:53	5 Do you see that?	13:55
6 MR. GAVENMAN: Objection.	13:53	6 A. Yes.	13:55
7 BY MR. GREIM:	13:53	7 Q. Now, were you conveying a message from	13:55
8 Q. I'm sorry. 1861.	13:53	8 Mr. Guo there?	13:55
9 A. Oh, yeah. It could be that person. So	13:53	9 A. Yes.	13:55
10 yeah.	13:53	10 Q. And so by December 24th, were	13:55
11 Q. It could have been the Tokyo person?	13:54	11 discussions far enough along that you had already	13:55
12 A. It could have been the Tokyo person, not	13:54	12 begun discussing the actual research project at	13:55
13 Miles. It's just very confusing. Yeah.	13:54	13 issue?	13:55
14 Q. So throughout this string, are you kind	13:54	14 A. Correct.	13:55
15 of talking about both matters at once?	13:54	15 Q. Okay. Then if you go on, you can see	13:56
16 A. Yes.	13:54	16 Ms. Wallop's response actually consumes the rest of	13:56
17 Q. The Guo and the Tokyo matter?	13:54	17 1864 through 1866. If you could, could you take a	13:56
18 A. Yes. They are all mixed.	13:54	18 second to review that, sir.	13:56
19 Q. Let's keep going now.	13:54	19 A. Um-hum.	13:56
20 A. Yeah.	13:54	20 [Witness peruses exhibit.]	13:56
21 Q. If you could go to the bottom of 1863,	13:54	21 THE WITNESS: Yeah.	13:56
22 December 22, 2017.	13:54	22 BY MR. GREIM:	13:57
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1	Q. Okay. Do you recall this conversation?	13:57	1	my understanding is he doesn't want me to sign it.	13:59
2	A. Yes. Now, I remember, yes.	13:57	2	Q. Guo does not want you to sign it?	13:59
3	Q. And you recall that Ms. Wallop did not	13:57	3	A. No. He does not.	13:59
4	want to agree to return of the deposit. Correct?	13:57	4	Q. Let me back up for a second here before	13:59
5	A. Um-hum.	13:57	5	we go further.	13:59
6	Q. You also see she references that you,	13:57	6	A. Yeah.	13:59
7	yourself, would be on the hook, because as of this	13:57	7	Q. We can stop looking at those texts for a	13:59
8	time, she understood that you were going to sign the	13:57	8	second.	13:59
9	contract. Do you see that part?	13:57	9	A. That's okay.	13:59
10	MR. GRENDI: Objection.	13:57	10	Q. What was your role here? Did you see	13:59
11	THE WITNESS: "We will have entered -- which	13:57	11	yourself as an intermediary between the two sides or	13:59
12	part?	13:58	12	as a representative of Guo?	13:59
13	BY MR. GREIM:	13:58	13	A. I think I'm a person to facilitate this	13:59
14	Q. Really, it's sort of at the bottom of	13:58	14	project. I am friend on both sides. I have no	14:00
15	1865 into 1866. Do you see it says -- at the very	13:58	15	financial interest in there.	14:00
16	bottom of 65, it says: "Since he wants you to sign."	13:58	16	My entire thing is driven by the political	14:00
17	A. Yeah.	13:58	17	agenda. So I just want to get the things done, you	14:00
18	Q. "And, therefore, be responsible for	13:58	18	know, achieve what we said we're going to do. That's	14:00
19	payments, that is also very complex and unfair to	13:58	19	it.	14:00
20	you."	13:58	20	Q. By the way, during this period, did Guo	14:00
21	A. Right. What's the question?	13:58	21	approach you and ask you to work for him full time?	14:00
22	Q. Well, do you recall that at some point,	13:58	22	MR. GAVENMAN: Objection to form.	14:00
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1	you were going to be the person to sign the	13:58	1	THE WITNESS: He did. I don't know when.	14:00
2	agreement?	13:58	2	BY MR. GREIM:	14:00
3	A. It wasn't that clear at the time who's	13:58	3	Q. And what was your response?	14:00
4	going to sign, because, obviously, I didn't want to	13:58	4	A. I thought I said I have to think about	14:00
5	get in the middle. That was my intention from the	13:58	5	it, but it's probably, I think way before this,	14:00
6	very beginning.	13:58	6	before the project.	14:00
7	Q. Well, where did the idea of you signing	13:58	7	Q. You don't recall telling Mr. Waller or	14:00
8	come from? Was it suggested by someone?	13:58	8	Ms. Wallop right around the time of the project that	14:01
9	A. I think French wants me to sign that as	13:58	9	Mr. Guo had made the suggestion to you and you were	14:01
10	go-between so I can communicate better with them and	13:58	10	considering it?	14:01
11	with Miles. That's my recollection.	13:59	11	A. I think --	14:01
12	Q. Okay. Now, why wouldn't Guo just sign	13:59	12	MR. GAVENMAN: Objection to form.	14:01
13	it himself?	13:59	13	THE WITNESS: I didn't remember if I	14:01
14	A. That, I don't know.	13:59	14	mentioned it. I probably did, but I didn't recall	14:01
15	Q. Did Guo not want to sign it himself?	13:59	15	the time and the contents -- the context.	14:01
16	MR. GAVENMAN: Objection.	13:59	16	BY MR. GREIM:	14:01
17	MR. GRENDI: Objection.	13:59	17	Q. Did there come a time when you	14:01
18	THE WITNESS: I have no idea.	13:59	18	ultimately told Mr. Guo that you wouldn't do it?	14:01
19	BY MR. GREIM:	13:59	19	MR. GAVENMAN: Objection to form.	14:01
20	Q. Well, did you discuss it with him?	13:59	20	THE WITNESS: I never made a specific -- we	14:01
21	A. No. We hadn't got -- you know, who is	13:59	21	just leave it at that.	14:01
22	going to sign, I think we have not got that far, but	13:59	22	BY MR. GREIM:	14:01
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1	Q. Well, after this time, did he ever come	14:01	1	officials, Wang Qishan, nephew -- not nephew --	14:03
2	back to you again and say he would like you to work	14:01	2	niece's E-mail account or bank account -- I forgot --	14:04
3	for him exclusively?	14:01	3	something to that effect. Yeah.	14:04
4	A. What do you mean, after this?	14:01	4	Q. And did they represent to you that they	14:04
5	Q. Well, let's say after December of 2017.	14:01	5	had done anything illegal?	14:04
6	A. 2017? I think we haven't discussed	14:01	6	A. Well, first of all, I cannot verify that	14:04
7	since. I didn't see anything at all. I didn't	14:02	7	is the real bank account or information. I just saw	14:04
8	respond, confirm or deny or reject. He never	14:02	8	the screen shot and there's a -- you know, it showed	14:04
9	mentioned it again.	14:02	9	the person's name and stuff, and so I didn't, you	14:04
10	Q. Do you remember a moment when Ms. Wallop	14:02	10	know, register anything of that thought.	14:04
11	called you to come over to her apartment --	14:02	11	Q. Sure. And my question is not what you	14:04
12	A. Yes.	14:02	12	think determined. It's did they represent to you	14:04
13	Q. -- late at night and look at something?	14:02	13	that they had done anything illegal in pulling up the	14:04
14	MR. GAVENMAN: Objection to form.	14:02	14	information?	14:04
15	THE WITNESS: There is some time, I think she	14:02	15	A. I didn't know, because we discussed	14:04
16	called me to come to her house.	14:02	16	about how to do it legally, and I think this was	14:05
17	BY MR. GREIM:	14:02	17	during the project formation of what we needed to be	14:05
18	Q. And what was the purpose of that visit?	14:02	18	done, how to not violate law in this country and go	14:05
19	MR. GAVENMAN: Objection to form.	14:02	19	outside of the country and do stuff that the other	14:05
20	THE WITNESS: I think -- I don't specifically	14:02	20	country might be legally obtained, this information.	14:05
21	remember. It probably has to do with the project.	14:02	21	Q. What impact did that have on you when	14:05
22	BY MR. GREIM:	14:02	22	you saw what they pulled up on the screen?	14:05
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1	Q. Did it have to do with something that	14:02	1	A. I first thought they have the ability,	14:05
2	she said she could find, some research that she could	14:02	2	the capacity, to dig into the information Miles is	14:05
3	find?	14:02	3	looking for, I was looking for, and if it's, you	14:05
4	A. Research she could find?	14:02	4	know, really real. So that was my first impression.	14:05
5	MR. GRENDI: Objection.	14:02	5	So I told Miles they have the capability to	14:06
6	THE WITNESS: We had so many meetings in her	14:02	6	get the information they needed. I mean we needed.	14:06
7	house. So I don't, you know, specifically recall.	14:03	7	Yeah.	14:06
8	You know, mostly, it relate to the research projects.	14:03	8	Q. Now, do you have any reason to think	14:06
9	BY MR. GREIM:	14:03	9	that what they showed you wasn't real?	14:06
10	Q. Okay. Do you recall her asking you to	14:03	10	A. I don't, because it's hard -- with just	14:06
11	come over so she can show you that she was able to	14:03	11	the one screen shot, it's very hard to say this is	14:06
12	get into a certain bank account on her computer?	14:03	12	the real thing.	14:06
13	A. Yes.	14:03	13	Q. Do you remember anything else they told	14:06
14	MR. GAVENMAN: Objection.	14:03	14	you about the screen shot?	14:06
15	BY MR. GREIM:	14:03	15	A. Yeah. They told me they have a team	14:06
16	Q. All right. And did you come over and	14:03	16	that got into the system and the system, you know, we	14:06
17	view it?	14:03	17	have to be very careful with the team outside of this	14:06
18	A. Yes.	14:03	18	country, and they want to be very careful and track	14:06
19	Q. What did you see?	14:03	19	information, because they can have some trigger	14:06
20	A. I saw -- I think Mike showed me that,	14:03	20	mechanisms, a switch that can turn it off, and then	14:06
21	not French, and, actually, it's a screen shot that	14:03	21	we should monitor the accounts rather than extract	14:07
22	shows one of the Chinese Government high-ranking	14:03	22	the information. I think that's the only thing I	14:07
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1 remember.	14:07	1 their own employees?	14:09
2 Q. Did they actually mention that to you	14:07	2 MR. GAVENMAN: Objection.	14:09
3 repeatedly, that it was important to monitor rather	14:07	3 THE WITNESS: I think they didn't	14:09
4 than, simply, breaking into the accounts?	14:07	4 specifically say that's their employees. They just	14:09
5 MR. GRENDI: Objection. You can answer.	14:07	5 hire contract people to do the work. I think that's	14:09
6 THE WITNESS: Yes.	14:07	6 my recollection.	14:09
7 MR. GRENDI: Sorry.	14:07	7 BY MR. GREIM:	14:09
8 THE WITNESS: Yeah. The emphasis was on that	14:07	8 Q. Let's talk now about the 15 names. We	14:09
9 point.	14:07	9 touched on this just a little bit earlier.	14:09
10 BY MR. GREIM:	14:07	10 A. Yeah.	14:09
11 Q. And was that your understanding of what	14:07	11 Q. Do you remember sitting with Mr. Guo --	14:09
12 they were supposed to be doing under the contract?	14:07	12 A. Yeah.	14:10
13 MR. GAVENMAN: Objection.	14:07	13 Q. -- and Ms. Wallop and Mr. Waller and	14:10
14 MR. GRENDI: Objection.	14:07	14 walking through a packet of the 15 names?	14:10
15 THE WITNESS: Under the contract, I think	14:07	15 MR. GAVENMAN: Objection.	14:10
16 there's specifically -- it says specific information	14:07	16 THE WITNESS: I think, yeah. I think -- I	14:10
17 that, you know, they were looking for and they were	14:07	17 don't know if I were there or Yvette, because at the	14:10
18 supposed to deliver, and I think whether always	14:07	18 very beginning, maybe I was there. We talked about a	14:10
19 monitor or not always monitor and extract at one	14:08	19 fish tank of things, and the names, maybe I learned	14:10
20 time, there's no such specification, you know,	14:08	20 later, because at one point, he didn't want me to get	14:10
21 specific provision in there.	14:08	21 involved.	14:10
22 BY MR. GREIM:	14:08	22 So I didn't know the names at the time.	14:10
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1 Q. So, however, your understanding is not	14:08	1 Basically, I'm saying I'm a little confused about	14:10
2 that the contract required them to break into the	14:08	2 whether I was present when the 15 names presented,	14:10
3 accounts. Correct?	14:08	3 but I learned later on. At least I know who they	14:10
4 MR. GRENDI: Objection.	14:08	4 are.	14:10
5 MR. GAVENMAN: Objection.	14:08	5 BY MR. GREIM:	14:10
6 THE WITNESS: Please rephrase.	14:08	6 Q. All right. By the way, when did -- when	14:10
7 BY MR. GREIM:	14:08	7 exactly did Yvette Wang get involved here?	14:11
8 Q. Sure. Your understanding is not that	14:08	8 A. So when they reached -- when we	14:11
9 the contract required them to break into these	14:08	9 basically negotiated on the project, the contract was	14:11
10 accounts, is it?	14:08	10 pretty done, like how much he's going to pay, who --	14:11
11 MR. GRENDI: Objection.	14:08	11 what the chunk, tranche of information they're going	14:11
12 MR. GAVENMAN: Objection.	14:08	12 to provide, and then we solved the deposit issue.	14:11
13 THE WITNESS: Not necessarily, but the	14:08	13 How we solved it, I didn't remember, and at the time,	14:11
14 discussion, during the discussion, the deliverables	14:08	14 the basic foundation is done. So he said, I don't	14:11
15 made it very clear that three types of -- three or	14:08	15 want you to get involved; so you're out.	14:11
16 four types information that the contract is going to	14:08	16 I didn't know what was going on afterwards,	14:11
17 require. That is including the detailed information	14:08	17 how the contract restructured, because there were	14:11
18 of financial statements, bank account, credit cards,	14:09	18 changes afterward. So I have no idea.	14:11
19 all of that.	14:09	19 Q. Do you recall that Mr. Guo walked away	14:11
20 BY MR. GREIM:	14:09	20 from the project, abandoned it, and a company called	14:12
21 Q. Okay. Did French and Mike tell you that	14:09	21 Eastern Profit came in to take his place?	14:12
22 all of the people working on the project would be	14:09	22 MR. GAVENMAN: Objection.	14:12
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<p>1 MR. GRENDI: Objection. 14:12</p> <p>2 THE WITNESS: I didn't know it. 14:12</p> <p>3 BY MR. GREIM: 14:12</p> <p>4 Q. Do you believe that happened? 14:12</p> <p>5 MR. GAVENMAN: Objection. 14:12</p> <p>6 MR. GRENDI: Objection. 14:12</p> <p>7 THE WITNESS: I didn't remember or recall how 14:12</p> <p>8 he walked out. At some point, he asked me, you know, 14:12</p> <p>9 you need to step in to manage the project. 14:12</p> <p>10 BY MR. GREIM: 14:12</p> <p>11 Q. So you were gone and then you were back? 14:12</p> <p>12 A. Yes. 14:12</p> <p>13 [Wang Exhibit No. 12 was 14:12</p> <p>14 identified for the record.] 14:12</p> <p>15 BY MR. GREIM: 14:12</p> <p>16 Q. Okay. Let's go to the names. I'm going 14:12</p> <p>17 to show what we've marked in another deposition as 14:12</p> <p>18 Exhibit 12, and you'll see that this is Wang Exhibit 14:12</p> <p>19 12. It starts at SVUS000171 and goes to 258, and if 14:13</p> <p>20 you thumb through, you'll see it follows the same 14:13</p> <p>21 format always. There is a number with someone's 14:13</p> <p>22 name, and then behind it is some information about 14:13</p>	<p>1 MR. GAVENMAN: Okay. 14:14</p> <p>2 BY MR. GREIM: 14:14</p> <p>3 Q. All right. So tell me what do you 14:14</p> <p>4 recall about this document? 14:14</p> <p>5 A. I remember this is -- I don't remember I 14:14</p> <p>6 saw this in my Miles' place. Probably I saw it 14:14</p> <p>7 through French, at French's house, but I'm not, you 14:14</p> <p>8 know, a hundred percent sure. 14:14</p> <p>9 Q. Do you remember that this is a document 14:14</p> <p>10 that Mr. Guo showed to Mr. Wallop and -- Mr. Waller 14:15</p> <p>11 and Ms. Wallop? 14:15</p> <p>12 A. Most likely. 14:15</p> <p>13 MR. GRENDI: Objection. 14:15</p> <p>14 MR. GAVENMAN: Objection. 14:15</p> <p>15 BY MR. GREIM: 14:15</p> <p>16 Q. And did you know that -- well, do you 14:15</p> <p>17 know where these names came from? 14:15</p> <p>18 MR. GAVENMAN: Objection. 14:15</p> <p>19 THE WITNESS: I don't know where it comes 14:15</p> <p>20 from, but I know this is probably what Miles wanted 14:15</p> <p>21 them to look into. 14:15</p> <p>22 BY MR. GREIM: 14:15</p>
<p>Page 170</p> <p>1 that person, and it goes on for several pages, and 14:13</p> <p>2 then there is a second name and so on. 14:13</p> <p>3 Take a second, if you could, just to study 14:13</p> <p>4 this and then I'll ask you a few questions about it. 14:13</p> <p>5 A. Yeah. I'm familiar with this. 14:13</p> <p>6 Q. Okay. 14:13</p> <p>7 MR. GRENDI: On the record, has Mr. Han 14:13</p> <p>8 signed the addendum to the protective order? 14:13</p> <p>9 MR. GREIM: Oh, no. He hasn't. Okay. Let's 14:13</p> <p>10 cover this. So we have a protective order in this 14:13</p> <p>11 case, confidential order, and many of the documents 14:13</p> <p>12 that we have here today are marked as confidential, 14:14</p> <p>13 at least as of right now. 14:14</p> <p>14 THE WITNESS: Yeah. 14:14</p> <p>15 MR. GREIM: So we'll ask you, and I'll work 14:14</p> <p>16 with your attorney on this, to sign an order agreeing 14:14</p> <p>17 to be bound by the protective order in this case, 14:14</p> <p>18 which means that you can take things here and, you 14:14</p> <p>19 know, show them around, talk them outside. Now, not 14:14</p> <p>20 all of this is going to end up remaining 14:14</p> <p>21 confidential, but until we've worked it out with the 14:14</p> <p>22 judge, that's sort of our status quo. 14:14</p>	<p>Page 172</p> <p>1 Q. Did you discuss with Mr. Guo which names 14:15</p> <p>2 would be good for the project? 14:15</p> <p>3 A. No, not at all. This is entirely his. 14:15</p> <p>4 Q. Do you know who did? 14:15</p> <p>5 A. I have no idea. 14:15</p> <p>6 Q. Do you remember a meeting in Guo's 14:15</p> <p>7 apartment where he had this stack of names and sort 14:15</p> <p>8 of tossed it out on the table to Ms. Wallop and Mr. 14:15</p> <p>9 Waller and said this cost him \$250 million? 14:15</p> <p>10 MR. GRENDI: Objection. 14:15</p> <p>11 MR. GAVENMAN: Objection. 14:15</p> <p>12 THE WITNESS: I don't remember that. I think 14:15</p> <p>13 the \$2 million, you know, that phrase, that, I 14:15</p> <p>14 remember vaguely, yeah. 14:16</p> <p>15 BY MR. GREIM: 14:16</p> <p>16 Q. Okay. Let me -- that was a compound 14:16</p> <p>17 question too. So let me ask you do you remember Mr. 14:16</p> <p>18 Guo claiming that this research had cost him, let's 14:16</p> <p>19 say, over \$200 million just to compile this? 14:16</p> <p>20 A. \$200 million? I don't remember \$200 14:16</p> <p>21 million. He exaggerates somewhat, like some certain 14:16</p> <p>22 amount for this research. 14:16</p>

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1	Q. Do you remember telling Ms. Wallop and Mr. Waller that the \$200 hundred was probably an exaggeration?	14:16	1	A. Wang Qishan, W-A-N-G, Q-I-S-H-A-N.	14:18
2		14:16	2	Q. This is the same person that Bannon had met with. Right?	14:18
3		14:16	3		14:18
4	A. I probably did.	14:16	4	A. Yes, and Mu Jen Ju is another person	14:18
5	Q. So did there come a time when you did study the names and information in this packet?	14:16	5	that is a Chinese security chief. He's also in here.	14:19
6		14:16	6	He persecuted Miles' family.	14:19
7	A. Yeah.	14:16	7	Q. Now, do you know whether Mr. Guo ended up getting research on these individuals from some other source other than Strategic Vision?	14:19
8	Q. When was that?	14:16	8		14:19
9	A. I don't recall the exact date.	14:16	9		14:19
10	Q. Do you remember why you would have looked through the names?	14:16	10	MR. GRENDI: Objection.	14:19
11		14:16	11	MR. GAVENMAN: Objection.	14:19
12	A. Why would he look?	14:16	12	THE WITNESS: That, I don't know.	14:19
13	Q. No. Why you would have?	14:17	13	BY MR. GREIM:	14:19
14	MR. GAVENMAN: Objection.	14:17	14	Q. Do you know whether he shared this information with any of research group after Strategic Vision?	14:19
15	THE WITNESS: I think -- I don't remember exactly how when they first come out. The first time	14:17	15		14:19
16	I look at this name, I don't remember exactly, but I did see the list either in New York or in French's house, but I just don't remember exactly where.	14:17	16		14:19
17		14:17	17	A. I didn't know that either.	14:19
18		14:17	18	MR. GAVENMAN: Objection.	14:19
19		14:17	19	BY MR. GREIM:	14:19
20	BY MR. GREIM:	14:17	20	Q. Do you know whether he ever hired a group called ASOG out of Texas?	14:19
21	Q. Okay. Do you remember forming any -- let me just ask you this: Do you remember having any	14:17	21		14:19
22		14:17	22	A. ASOG? No.	14:19
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1	thoughts about whether some of these names would be good subjects for research?	14:17	1	Q. Do you know whether he hired an individual named Adam Craft?	14:19
2		14:17	2	A. No.	14:19
3	A. I think they're all good subjects for research.	14:17	4	Q. Does that name ring a bell to you?	14:19
4		14:17	5	A. Not at all.	14:19
5	Q. Why is that?	14:17	6	Q. Does the name ASOG sound familiar to you?	14:19
6	A. Because this is the key group in the control of China's bank system and investment.	14:17	7		14:19
7		14:17	8	A. Not at all.	14:20
8	Q. So do you know that that's what all these names have in common?	14:17	9	Q. So what did Mr. Guo tell you about this list, if anything?	14:20
9		14:18	10	A. He didn't really discuss this list with me at all, but when I saw it, I know what he's after.	14:20
10	A. Yes, except --	14:18	11		14:20
11	MR. GAVENMAN: Objection.	14:18	12		14:20
12	THE WITNESS: -- there's -- huh?	14:18	13	Q. Is some of the same information that's in this list already on the internet? Have you seen it on there?	14:20
13	MR. GAVENMAN: Objection to form. You can answer.	14:18	14		14:20
14		14:18	15	MR. GRENDI: Objection.	14:20
15	THE WITNESS: Except there's also like the former party chief's grandson, but for Wang Qishan's group, may of the names here that were in Wang Qishan's group, I think they're all involved in Chinese banging corruption.	14:18	16	MR. GAVENMAN: Objection.	14:20
16		14:18	17	THE WITNESS: There might be some.	14:20
17		14:18	18	BY MR. GREIM:	14:20
18		14:18	19	Q. Do you have any understanding about who actually paid Strategic Vision, if anyone, for the work under this agreement?	14:20
19		14:18	20		14:20
20	BY MR. GREIM:	14:18	21		14:20
21	Q. What's the name? Could you spell out the name that you're telling us? Wang?	14:18	22		14:20
22		14:18			

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<p>1 MR. GRENDI: Objection. 14:20</p> <p>2 THE WITNESS: I have no idea. 14:20</p> <p>3 BY MR. GREIM: 14:20</p> <p>4 Q. Do you know if it was Guo himself? 14:20</p> <p>5 MR. GAVENMAN: Objection. 14:21</p> <p>6 THE WITNESS: I have no idea. 14:21</p> <p>7 BY MR. GREIM: 14:21</p> <p>8 Q. Do you know whether Guo consulted with anyone else in coming up with the names? 14:21</p> <p>10 MR. GAVENMAN: Objection. 14:21</p> <p>11 MR. GRENDI: Objection. 14:21</p> <p>12 THE WITNESS: He might have, but he didn't 14:21</p> <p>13 mention that to me. 14:21</p> <p>14 BY MR. GREIM: 14:21</p> <p>15 Q. Do you know whether Guo planned to share the research results from this agreement with any other person? 14:21</p> <p>18 MR. GRENDI: Objection. 14:21</p> <p>19 MR. GAVENMAN: Objection, form 14:21</p> <p>20 THE WITNESS: I didn't know that. 14:21</p> <p>21 BY MR. GREIM: 14:21</p> <p>22 Q. So do you recall, roughly, the date when 14:21</p>	<p>1 A. No. 14:22</p> <p>2 Q. Why not? 14:22</p> <p>3 A. Because I know she is with him for, you 14:22</p> <p>4 know, 16 years at the time. So he trusted her very 14:22</p> <p>5 much. 14:23</p> <p>6 Q. But why would Mr. Guo tell other people that he did not trust her? 14:23</p> <p>8 MR. GRENDI: Objection. 14:23</p> <p>9 MR. GAVENMAN: Objection. 14:23</p> <p>10 THE WITNESS: I have no idea. 14:23</p> <p>11 BY MR. GREIM: 14:23</p> <p>12 Q. Well, do you know why you, once again, replaced Yvette Wang later on in the parties' dealings? 14:23</p> <p>15 MR. GRENDI: Objection. 14:23</p> <p>16 MR. GAVENMAN: Objection. 14:23</p> <p>17 THE WITNESS: I think he tried to salvage the 14:23</p> <p>18 project. He saw the project falling apart because he 14:23</p> <p>19 didn't get what he is paying for and he thought maybe 14:23</p> <p>20 I can better communicate with French and Mike's team 14:23</p> <p>21 and get what he's looking for. 14:23</p> <p>22 BY MR. GREIM: 14:24</p>
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<p>1 -- well, let me back up for a second. 14:22</p> <p>2 I understand your testimony to be that while you were involved with Mr. Guo and Strategic Vision, some deal was agreed to in principle. Correct? 14:22</p> <p>5 A. Yes. 14:22</p> <p>6 MR. GRENDI: Objection. 14:22</p> <p>7 BY MR. GREIM: 14:22</p> <p>8 Q. Then at that point, Yvette Wang came in to take over negotiating the details of the contract itself? 14:22</p> <p>11 MR. GAVENMAN: Objection. 14:22</p> <p>12 MR. GRENDI: Objection. 14:22</p> <p>13 THE WITNESS: Yes. 14:22</p> <p>14 BY MR. GREIM: 14:22</p> <p>15 Q. Did it -- knowing that Mr. Guo had been concerned about Ms. Wang earlier, did it surprise you that she was brought in to negotiate the contract? 14:22</p> <p>18 MR. GRENDI: Objection. 14:22</p> <p>19 MR. GAVENMAN: Objection. 14:22</p> <p>20 THE WITNESS: No. 14:22</p> <p>21 BY MR. GREIM: 14:22</p> <p>22 Q. Did it concern you? 14:22</p>	<p>1 Q. Okay. Do you know whether Strategic Vision wanted to have you as their point, their main point of contact? 14:24</p> <p>4 MR. GAVENMAN: Objection. 14:24</p> <p>5 THE WITNESS: Yes. 14:24</p> <p>6 BY MR. GREIM: 14:24</p> <p>7 Q. And did they say why that was? 14:24</p> <p>8 MR. GAVENMAN: Objection. 14:24</p> <p>9 THE WITNESS: I think they feel they can 14:24</p> <p>10 better communicate with me and also they trust me, I 14:24</p> <p>11 think. 14:24</p> <p>12 BY MR. GREIM: 14:24</p> <p>13 Q. By the way, did you discuss with Strategic Vision the importance of not using Chinese entities as either the contracting parties or the funding parties for the contract? 14:24</p> <p>17 MR. GAVENMAN: Objection. 14:24</p> <p>18 MR. GRENDI: Objection. 14:24</p> <p>19 THE WITNESS: I didn't remember specifically 14:25</p> <p>20 that suggestion. 14:25</p> <p>21 BY MR. GREIM: 14:25</p> <p>22 Q. Knowing what you know about the mainland 14:25</p>

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<p>1 and about the Chinese Government -- 14:25</p> <p>2 A. Right. 14:25</p> <p>3 Q. -- do you agree that it would be prudent 14:25</p> <p>4 not to use a Chinese entity or a Chinese bank to pay 14:25</p> <p>5 Strategic Vision under the contract? 14:25</p> <p>6 MR. GRENDI: Objection. 14:25</p> <p>7 MR. GAVENMAN: Objection. 14:25</p> <p>8 THE WITNESS: I didn't -- I -- from the very 14:25</p> <p>9 beginning, we want to keep this highly confidential. 14:25</p> <p>10 Everything we do has to be, you know, like very 14:25</p> <p>11 cautious, and whether I made that specific 14:25</p> <p>12 suggestion, I don't remember, but if I did, it must 14:25</p> <p>13 be based on that principle. 14:25</p> <p>14 BY MR. GREIM: 14:25</p> <p>15 Q. And that would be common sense, wouldn't 14:25</p> <p>16 it? 14:25</p> <p>17 MR. GRENDI: Objection. 14:25</p> <p>18 MR. GAVENMAN: Objection. 14:25</p> <p>19 THE WITNESS: It is not necessarily Chinese 14:25</p> <p>20 company. I think it's how confidential, how 14:25</p> <p>21 trustworthy they are, not the entities, from where. 14:26</p> <p>22 It's the discrete nature of the entity that matters. 14:26</p>	<p>1 MR. GAVENMAN: Objection. 14:27</p> <p>2 THE WITNESS: It's possible, yes. Hong Kong 14:27</p> <p>3 has a different system, but China has a lot of 14:27</p> <p>4 difference there. 14:27</p> <p>5 BY MR. GREIM: 14:27</p> <p>6 Q. When did you first hear of the entity 14:27</p> <p>7 called Eastern Profit? 14:27</p> <p>8 A. I don't think I ever heard that term 14:27</p> <p>9 until this case, you know, showed up. 14:27</p> <p>10 Q. Did you know that Mr. Guo's daughter is 14:27</p> <p>11 the sole shareholder and director of Eastern Profit? 14:27</p> <p>12 MR. GRENDI: Objection. 14:27</p> <p>13 MR. GAVENMAN: Objection. 14:27</p> <p>14 THE WITNESS: No. 14:27</p> <p>15 BY MR. GREIM: 14:27</p> <p>16 Q. Do you know whether Mr. Guo typically 14:27</p> <p>17 has his children hold companies that he uses for his 14:27</p> <p>18 projects? 14:27</p> <p>19 A. I didn't. 14:28</p> <p>20 MR. GRENDI: Objection. 14:28</p> <p>21 MR. GAVENMAN: Objection. 14:28</p> <p>22 THE WITNESS: I didn't know. 14:28</p>
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<p>1 in charge of a research project like for this for Mr. 14:29 2 Guo? 14:29 3 MR. GRENDI: Objection. 14:29 4 MR. GAVENMAN: Objection, form. 14:29 5 THE WITNESS: As I said, nothing surprises 14:29 6 me. 14:29 7 BY MR. GREIM: 14:29 8 Q. Have you ever heard of an entity called 14:29 9 Celestial Tide Holdings? 14:29 10 A. Never. 14:29 11 Q. Do you recall that after Yvette Wang 14:29 12 came in to finalize the contract with Strategic 14:30 13 Vision that new disputes erupted? 14:30 14 MR. GRENDI: Objection. 14:30 15 MR. GAVENMAN: Objection. 14:30 16 THE WITNESS: I didn't. If I did, maybe from 14:30 17 French, not from Miles or Yvette. 14:30 18 BY MR. GREIM: 14:30 19 Q. Okay. If you look on December 30th, 14:30 20 this is on page 1867 of Han Exhibit 10. 14:30 21 A. 67? 14:30 22 Q. Um-hum. 14:30 </p>	<p>1 Q. And then if you keep going -- I think 14:31 2 it's still the same thread -- you'll go to page 1869. 14:31 3 You'll see that toward the top, she says: "Also on 14:31 4 other fav subject, Y mentioned on Wed she needs to 14:32 5 get back to NY to collect her bonus for the year. So 14:32 6 she would be excited that NY would be glad that we 14:32 7 had an agreement finally." 14:32 8 Does that appear to be a reference to Yvette 14:32 9 Wang? 14:32 10 A. Correct. 14:32 11 MR. GAVENMAN: Objection. 14:32 12 MR. GRENDI: Objection. 14:32 13 BY MR. GREIM: 14:32 14 Q. Does it appear to you that by December 14:32 15 30th, Yvette Wang was now negotiating directly with 14:32 16 French Wallop? 14:32 17 A. Yes. 14:32 18 MR. GAVENMAN: Objection. 14:32 19 MR. GREIM: All right. Let's go ahead and 14:32 20 take a break at that point, because we're about done 14:32 21 with the video. 14:32 22 VIDEOGRAPHER: This ends Disk No. 2, going 14:32 </p>
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<p>1 A. There it is. Yeah. 14:30 2 Q. You'll see that Ms. Wallop begins that 14:30 3 day responding to a question from you about the other 14:30 4 matter that you were working on. 14:31 5 A. Yes. 14:31 6 Q. It looks like you were taking some CLE. 14:31 7 A. Yes. 14:31 8 Q. And you see at the bottom of that, the 14:31 9 first thing she says: "What time on Tuesday? Did 14:31 10 you speak with NY?" 14:31 11 A. Let me see. 14:31 12 Q. It's right before the three emojis. 14:31 13 A. Okay. "What time on Tuesday? Did you 14:31 14 speak with NY?" 14:31 15 Yeah. Yeah. That's New York. It refers to 14:31 16 Miles Kwok. 14:31 17 Q. Okay. And you'll see that she goes on 14:31 18 that morning and sends you some hotel 14:31 19 recommendations? 14:31 20 A. Yes. 14:31 21 Q. And many other things? 14:31 22 A. Yes. 14:31 </p>	<p>1 off the record. The time is now 2:34 p.m. 14:32 2 [Recess.] 14:52 3 VIDEOGRAPHER: This begins Disk No. 3 in the 14:52 4 video deposition of Lianchao Han. We are back on the 14:52 5 record. The time is 2:54 p.m. 14:52 6 BY MR. GREIM: 14:52 7 Q. Mr. Han, welcome back. 14:52 8 A. Thank you. 14:52 9 Q. If you could, we left on page 1869, but 14:52 10 I've got a question for you -- this is still in 14:53 11 Exhibit 10 -- about the pages 1884 through 1903, 14:53 12 which is the last page. 14:53 13 A. Right. 14:53 14 Q. And my question for you is would you 14:53 15 agree with me that everything from 1884 to 1903 14:53 16 refers to matters other than the Strategic Vision 14:53 17 Eastern Profit contract? 14:53 18 A. I think most the time, most of it, yes. 14:53 19 That's correct, except maybe 86. 14:53 20 Q. Oh. 14:53 21 A. I think that looks like -- 14:53 22 Q. Yeah. 14:53 </p>

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<p>1 A. -- about their disputes. 14:53</p> <p>2 Q. Okay. And that's a text exchange on 14:53</p> <p>3 February 26th, it looks like. Right? 14:53</p> <p>4 A. Yes. 14:54</p> <p>5 Q. Okay. All right. Then I guess -- all 14:54</p> <p>6 right. I follow you. I guess on February 28th, on 14:54</p> <p>7 1887, that is about the lawsuit as well. 14:54</p> <p>8 A. Correct. I mean the dispute of some 14:54</p> <p>9 sort. 14:54</p> <p>10 Q. Okay. So would you agree with me, 14:54</p> <p>11 though, that everything else in here is about other 14:54</p> <p>12 work that you were discussing with Ms. Wallop? 14:54</p> <p>13 A. Correct. 14:54</p> <p>14 Q. Did any of those dealings come to 14:54</p> <p>15 fruition? 14:54</p> <p>16 A. No. 14:54</p> <p>17 Q. Let me ask you -- let's go back to 1869. 14:54</p> <p>18 A. Yeah. 14:54</p> <p>19 Q. And I want you to focus on after the 14:54</p> <p>20 three question marks that end a sentence somewhere 14:54</p> <p>21 about in the middle or so. 14:55</p> <p>22 A. 89? 14:55</p>	<p>1 A. Um-hum. 14:56</p> <p>2 Q. Did you have any understanding that 14:56</p> <p>3 Yvette Wang was a project manager on this? 14:56</p> <p>4 MR. GAVENMAN: Object to the form. 14:56</p> <p>5 MR. GRENDI: Objection. 14:56</p> <p>6 THE WITNESS: I didn't know until maybe 14:56</p> <p>7 later. 14:56</p> <p>8 BY MR. GREIM: 14:56</p> <p>9 Q. Okay. 14:56</p> <p>10 A. Not at that point. 14:56</p> <p>11 Q. Had you ever heard that title used with 14:56</p> <p>12 respect to Yvette Wang, that she was a project 14:56</p> <p>13 manager? 14:56</p> <p>14 A. I didn't know. I didn't, no. 14:56</p> <p>15 Q. Now you said until maybe later. Was 14:56</p> <p>16 there some point where you did learn that she was 14:56</p> <p>17 project manager? 14:57</p> <p>18 MR. GAVENMAN: Objection to form. 14:57</p> <p>19 MR. GRENDI: Objection. 14:57</p> <p>20 THE WITNESS: I don't think they ever used 14:57</p> <p>21 the project manager, but she is in charge of the 14:57</p> <p>22 project. 14:57</p>
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<p>1 Q. On 1869. 14:55</p> <p>2 A. 69? 14:55</p> <p>3 Q. Yeah. 14:55</p> <p>4 A. Sorry. Okay. 14:55</p> <p>5 Q. Three question marks, and then Ms. 14:55</p> <p>6 Wallop says: "I naturally asked tea or water ginger 14:55</p> <p>7 ale, and her comment, quote, no, we need to talk 14:55</p> <p>8 about agreement. I spoke for two hours with HK and 14:55</p> <p>9 they told me I cannot sign for monthly amount, 14:55</p> <p>10 exclamation point, but her boss told her to do it and 14:55</p> <p>11 come back with signed doc." 14:55</p> <p>12 Did I read that right? 14:55</p> <p>13 A. Um-hum. 14:55</p> <p>14 Q. Now, did you ever hear Yvette Wang or 14:55</p> <p>15 Mr. Guo talk about having to check with individuals 14:55</p> <p>16 in Hong Kong? 14:56</p> <p>17 A. No. 14:56</p> <p>18 Q. If you go to page 1871, after the emojis 14:56</p> <p>19 toward the top, you'll see: "She said and as she 14:56</p> <p>20 kept saying with abundant authority, I am project 14:56</p> <p>21 manager. I decide." 14:56</p> <p>22 Do you see that? 14:56</p>	<p>1 BY MR. GREIM: 14:57</p> <p>2 Q. If you look at page 1879 and go to the 14:57</p> <p>3 top -- 14:57</p> <p>4 A. Yeah. 14:57</p> <p>5 Q. -- you see this is a carryover from the 14:57</p> <p>6 previous page. 14:57</p> <p>7 A. Right. 14:57</p> <p>8 Q. But Ms. Wallop is sending you a piece 14:57</p> <p>9 about HNA that was in "The Financial Times". Do you 14:57</p> <p>10 see that? 14:58</p> <p>11 A. Okay. 14:58</p> <p>12 [Witness peruses exhibit.] 14:58</p> <p>13 THE WITNESS: Okay. 14:58</p> <p>14 BY MR. GREIM: 14:58</p> <p>15 Q. And then your response to her is: "I 14:58</p> <p>16 gave the story to WSJ a week ago. They're too slow, 14:58</p> <p>17 but we have more details." 14:58</p> <p>18 And then continuing to the next page: "My 14:58</p> <p>19 advice is to focus on what already in place to 14:58</p> <p>20 harvest and what will be harvested would be harvested 14:58</p> <p>21 in the next batch. Good luck." 14:58</p> <p>22 Did I read the right? 14:58</p>

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<p>1 A. Yes. 14:58</p> <p>2 Q. What was your intent -- first of all, 14:58</p> <p>3 were you talking to her about the Strategic Vision 14:58</p> <p>4 work? 14:58</p> <p>5 MR. GAVENMAN: Objection to form. 14:58</p> <p>6 MR. GRENDI: Objection. 14:58</p> <p>7 THE WITNESS: When was this? 14:58</p> <p>8 Okay. But we have more detail. Okay. Yeah. 14:58</p> <p>9 I know what -- can you reframe your question, please? 14:59</p> <p>10 BY MR. GREIM: 14:59</p> <p>11 Q. Sure. Were you speaking with her about 14:59</p> <p>12 the Strategic Vision work on the research? 14:59</p> <p>13 MR. GRENDI: Objection. 14:59</p> <p>14 MR. GAVENMAN: Objection, form. 14:59</p> <p>15 THE WITNESS: Yeah. It looks like it. 14:59</p> <p>16 BY MR. GREIM: 14:59</p> <p>17 Q. And what was your advice to her? 14:59</p> <p>18 A. I don't remember specifically. It looks 14:59</p> <p>19 like my advice is to focus on what's already in place 14:59</p> <p>20 to harvest and what will be harvested in the next 14:59</p> <p>21 batch. Yeah. I think that I advised them to follow 14:59</p> <p>22 the schedule of the deliverables, don't deviate from 14:59</p>	<p>1 supposed to touch them, even look into them. I don't 15:01</p> <p>2 know if that's true or not, but I said my point is 15:01</p> <p>3 even if you have five people you can't touch, but 15:01</p> <p>4 there's so many on the list. At least you need to 15:01</p> <p>5 produce something substantial that will satisfy Miles 15:01</p> <p>6 and the contractual, you know, obligations and 15:01</p> <p>7 satisfy Miles; otherwise, I said we're going to be 15:01</p> <p>8 trouble. I think that's what I see coming. Miles 15:02</p> <p>9 will terminate the contract. There will be lawsuits 15:02</p> <p>10 going on between the two sides, exactly what I said 15:02</p> <p>11 at the time. 15:02</p> <p>12 Q. And that what you were trying to avoid 15:02</p> <p>13 here? 15:02</p> <p>14 A. Correct. 15:02</p> <p>15 MR. GRENDI: Objection. 15:02</p> <p>16 MR. GREIM: Okay. I'm now going to show you 15:02</p> <p>17 what we marked in another deposition as Exhibit 5. 15:02</p> <p>18 [Wang Exhibit No. 5 was 15:02</p> <p>19 identified for the record.] 15:02</p> <p>20 BY MR. GREIM: 15:02</p> <p>21 Q. And these are -- this is Wang Exhibit 5, 15:02</p> <p>22 Bates labeled SVUS000061 to 76. These are a series 15:02</p>
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<p>1 A. And I don't know where we met, because 15:04 2 he was -- he didn't show up -- no. I don't remember 15:04 3 was he in the first meeting with Miles. Probably 15:04 4 not. He was behind. Yeah. I don't recall 15:04 5 specifically the date. 15:04</p> <p>6 Q. Did you feel that you had a good rapport 15:04 with Mr. Waller? 15:04</p> <p>8 A. What? 15:04</p> <p>9 Q. Did you feel that you a good rapport 15:04 with Mr. Waller? 15:04</p> <p>11 A. Yes. 15:04</p> <p>12 Q. In fact, did you share the same mentor, 15:04 someone named Bernie? 15:04</p> <p>14 A. Correct. Yes. 15:04</p> <p>15 Q. And so Bernie had been -- had served 15:04 with Chaing Kai-shek or something like that? 15:04</p> <p>17 A. He was hero in anti-Japanese war. He 15:04 18 was involved in the KMT, the Taiwan Government 15:04 19 intelligence. 15:05</p> <p>20 Q. I see. So he was a mentor to you, but 15:05 also a mentor to Mr. Waller? 15:05</p> <p>22 A. Correct. 15:05</p>	<p>1 could not provide. I hope your trip is fruitful." 15:06 2 Do you see that? 15:06</p> <p>3 A. Um-hum. 15:06</p> <p>4 Q. And then you say: Great meeting with 15:06 our friend. He is coming in two weeks in 15:06 Washington." 15:06</p> <p>7 Who are you speaking of there? 15:06</p> <p>8 A. I think this is a friend from Tokyo. 15:06</p> <p>9 Q. This is Tokyo? 15:06</p> <p>10 A. Yeah. 15:06</p> <p>11 Q. Is Mr. Waller talking about this 15:06 particular project or another one? Can you tell? 15:06</p> <p>13 MR. GAVENMAN: Objection, form. 15:06</p> <p>14 MR. GRENDI: Objection. 15:06</p> <p>15 THE WITNESS: 62? 15:06</p> <p>16 BY MR. GREIM: 15:06</p> <p>17 Q. Um-hum. 15:06</p> <p>18 A. Another week's time -- I think this is 15:06 19 talking about -- he's talking about Miles' research 15:07 project. 15:07</p> <p>21 Q. Well, were there some things that 15:07 Strategic Vision said that they could not provide and 15:07</p>
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<p>1 Q. But probably not at the same time? 15:05 2 A. Roughly around the time. 15:05</p> <p>3 Q. Oh, around the same time. Okay. 15:05 4 A. Yes. 15:05</p> <p>5 Q. Sorry. 15:05 6 Okay. So let's go to the next page. You'll 15:05 7 see that on December the 14th now, the dark gray is 15:05 8 saying: "I had a very productive meeting with a key 15:05 9 capabilities person who is ready. I asked him for 15:05 10 another week's time to we don't lose his team. He 15:05 11 agreed." 15:05</p> <p>12 Do you see that? 15:05 13 A. Yes. 15:05</p> <p>14 Q. Do you recall what Mr. Waller is telling 15:05 you there, what he's talk about? 15:05 16 A. I don't. No. I don't remember 15:05 17 specifically -- 15:06</p> <p>18 Q. Okay. 15:06 19 A. -- the content. 15:06</p> <p>20 Q. Let's go down a few days later. Mr. 15:06 21 Waller says: "We can now provide the entire menu 15:06 22 that the friend requested, including items we said we 15:06</p>	<p>1 then they say, no, they could? 15:07 2 MR. GRENDI: Objection, form. 15:07</p> <p>3 MR. GAVENMAN: Objection. 15:07</p> <p>4 THE WITNESS: I don't specifically recall 15:07 5 what they say they cannot provide. I think 15:07 6 everything is based on what's in the contract. 15:07</p> <p>7 BY MR. GREIM: 15:07</p> <p>8 Q. Okay. 15:07 9 A. If they said they can't provide, that's 15:07 10 supposed to be specified in the contract. 15:07</p> <p>11 Q. Let me direct you now to the December 15:07 23rd texts. They go from 64 to 65. 15:07 12 A. 65. 15:07</p> <p>13 Q. It starts off with Mr. Waller asking 15:07 you: "Any news?" 15:07 14 A. Any news? Yeah. This is, again, I 15:07 15 think this is the Tokyo guy. 15:08</p> <p>16 Q. Okay. And then what about your text at 15:08 6:19 a.m.? 15:08 17 You say -- it looks like Mr. Waller says: 15:08 "What about the guy we saw last week?" 15:08 18 And then you respond: "I will ask." 15:08</p>
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<p>1 [Witness peruses exhibit.] 15:08</p> <p>2 THE WITNESS: I'm trying to remember this. 15:08</p> <p>3 Why -- 15:08</p> <p>4 BY MR. GREIM: 15:08</p> <p>5 Q. If it would help you, turn to page 65 15:08</p> <p>6 too. The conversation continues. I want you to read 15:08</p> <p>7 the whole thing, because it may help you. 15:09</p> <p>8 [Witness peruses exhibit.] 15:09</p> <p>9 THE WITNESS: Honestly, I don't remember 15:09</p> <p>10 this. I'm trying to figure out -- I think we're not 15:09</p> <p>11 talking about Miles at this point, but I'm not sure 15:09</p> <p>12 who. 15:09</p> <p>13 Yeah. I'm a little confused here. I think 15:09</p> <p>14 -- what time they sign the contract? December 30th? 15:10</p> <p>15 Sorry. I just don't specifically recall this. 15:10</p> <p>16 BY MR. GREIM: 15:10</p> <p>17 Q. Well, I will represent to you that the 15:10</p> <p>18 contract was signed on January the 6th. 15:10</p> <p>19 A. January 6th, okay, but when we talk 15:10</p> <p>20 about here I arrive on the 2nd, that definitely is 15:10</p> <p>21 the Japanese guy. Which day would you like to meet? 15:10</p> <p>22 I will ask. He's eager to meet. 15:10</p>	<p>1 Q. You see Mr. Waller responds to the cheap 15:11</p> <p>2 as possible comment. He says: "He will fail if he 15:11</p> <p>3 does it on the cheap. This project is not a Chinese 15:11</p> <p>4 sweatshop. Let's focus on the other guy." 15:11</p> <p>5 And then he goes on talks about that. Do you 15:11</p> <p>6 see that? 15:11</p> <p>7 A. Yes. Yes. 15:11</p> <p>8 Q. And then you respond: "Agree. He 15:11</p> <p>9 arrives on the 2nd." 15:11</p> <p>10 A. Yeah. That's the Japanese guy. 15:11</p> <p>11 Q. Right. So now you're back on the 15:11</p> <p>12 Japanese guy? 15:11</p> <p>13 A. Yes. 15:11</p> <p>14 Q. And then do you see, later, on December 15:11</p> <p>15 23rd, now turning to page 66, you say: "We should 15:11</p> <p>16 wait a few more days for our NYC friend." 15:12</p> <p>17 Now, you're referring to Mr. Guo again? 15:12</p> <p>18 A. I think so. 15:12</p> <p>19 Q. And then Mr. Waller says: "I trust your 15:12</p> <p>20 judgment. I'm not anxious to dialogue with him 15:12</p> <p>21 further." 15:12</p> <p>22 A. That's correct. 15:12</p>
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<p>1 [Witness peruses exhibit.] 15:10</p> <p>2 THE WITNESS: I think this is probably Miles. 15:10</p> <p>3 "Okay. Thanks. I don't think my guy is 15:10</p> <p>4 serious." 15:10</p> <p>5 "I have a mixed feeling about it", that, I 15:10</p> <p>6 think will refer to Miles, the project, because Miles 15:10</p> <p>7 goes back and forth. 15:10</p> <p>8 BY MR. GREIM: 15:10</p> <p>9 Q. Right. 15:10</p> <p>10 A. Whether he wants to do it or he doesn't 15:10</p> <p>11 want to do it, because, you know, he's not sure 15:10</p> <p>12 they're going to deliver. I think that's -- yeah. 15:11</p> <p>13 He also wants to do it as cheap as possible. 15:11</p> <p>14 Okay. Agreed. He arrives on the 2nd. We can 15:11</p> <p>15 meet the 3rd. 15:11</p> <p>16 Q. Do you see Mr. Waller -- let me stop 15:11</p> <p>17 you, Mr. Han, and we'll try to go more of a back and 15:11</p> <p>18 here, keep it in a question and answer format. 15:11</p> <p>19 A. Yeah. 15:11</p> <p>20 Q. So if you look in the middle of page 15:11</p> <p>21 65 -- 15:11</p> <p>22 A. 65, yeah. 15:11</p>	<p>1 Q. And then you say: "Understand. 15:12</p> <p>2 Thanks." 15:12</p> <p>3 A. Um-hum. 15:12</p> <p>4 Q. Now, the next day, December 24rd, that 15:12</p> <p>5 evening, do you -- if you look at your 9-18 p.m. 15:12</p> <p>6 comment -- 15:12</p> <p>7 A. Yeah. 15:12</p> <p>8 Q. Are you talking again about Mr. Guo 15:12</p> <p>9 there? 15:12</p> <p>10 A. Yes. This is definitely -- yes. 15:12</p> <p>11 Q. He wants to -- "He would like to put a 15:12</p> <p>12 clause in the contract which says if you fail to 15:12</p> <p>13 provide the deliverables as defined in the scope, you 15:12</p> <p>14 should return the deposit. What do you think?" 15:12</p> <p>15 A. Yes. 15:12</p> <p>16 Q. And then you see that Mr. Waller has a 15:12</p> <p>17 response: "Well, it's progress." 15:12</p> <p>18 But then do you see, he says: "The issue, of 15:12</p> <p>19 course, is the timeframe for determining whether the 15:12</p> <p>20 deliverables meet the scope." 15:13</p> <p>21 Do you see that? 15:13</p> <p>22 A. Yes. 15:13</p>
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1	Q. He says: "That probably won't be possible in the first 30 -- and then you've got to flip over to see the rest of it.	15:13	1	A. Yeah. From the text --	15:14
2		15:13	2	MR. GAVENMAN: Objection to the extent that's	15:14
3		15:13	3	a new question.	15:14
4	A. Yes.	15:13	4	MR. GRENDI: Same objection.	15:14
5	Q. "In the 30 days because of startup work. I suggest a minimum of 90 days."	15:13	5	THE WITNESS: I understand what he's saying.	15:14
6		15:13	6	He needs more time to deliver.	15:14
7	Do you see that?	15:13	7	BY MR. GREIM:	15:14
8	A. Yes.	15:13	8	Q. Right.	15:14
9	Q. And then he goes on and asks you a question: "What is his proposed timeframe for determining when the deliverables are satisfactory or not? Do you think that he will be dependable about scope and not say at some point that we failed to deliver according to the scope simply because he changed his mind?"	15:13	9	A. The startup, you know, is only 30 days.	15:14
10		15:13	10	Q. Right.	15:14
11		15:13	11	A. Yeah. I understand that.	15:14
12		15:13	12	Q. And then do you see you respond to him "I don't know who will sign"?	15:14
13		15:13	13	A. But why I jump to that, I don't know why. There's no content here, because we -- so I just, obviously, I don't know who will sign. Yes.	15:15
14		15:13	14	Q. Right. Well, let's look at Mr. Waller's response to that.	15:15
15		15:13	15	A. Yeah.	15:15
16	Do you see that?	15:13	16	Q. He says: "He proposed you and asked us if that would be acceptable to us. All of us agreed. Let's keep the agreement."	15:15
17	A. Yes.	15:13	17		15:15
18	Q. And then he continues, but it doesn't -- the bubble ends. Right?	15:13	18		15:15
19		15:13	19		15:15
20	A. Um-hum.	15:13	20		15:15
21	MR. GRENDI: It's on the next page.	15:13	21		15:15
22	MR. GREIM: Oh, okay. Oh, good.	15:13	22		15:15
		Page 206			Page 208
1	BY MR. GREIM:	15:13	1	Do you see that?	15:15
2	Q. Okay. So if you go to 68 -- I wondered about this -- it continues on. He says: "As it stands, the written contract gives either party the right to terminate for any reason with 30 days notice. So if he gives 30 days notice, we would prorate the 30 days from the deposit and return the balance under any normal circumstance."	15:13	2	A. Um-hum.	15:15
3		15:13	3	Q. Now, did you realize that it was Mr. Guo that suggested that you sign the agreement?	15:15
4		15:13	4	A. Yes.	15:15
5		15:13	5	MR. GRENDI: Objection.	15:15
6		15:13	6	MR. GAVENMAN: Objection.	15:15
7		15:13	7	BY MR. GREIM:	15:15
8		15:13	8	Q. And then maybe we need to turn for this one as well. Yeah. You can see he starts to go on on page 67, but you've got to move all the way to 69 to read that.	15:15
9	Do you see that?	15:14	9	A. Yes.	15:15
10	A. Um-hum.	15:14	10	Q. Do you see Mr. Waller says: "If he changes his mind on you, it indicates to me he doesn't fully trust you. Not a good thing."	15:16
11	Q. Now, did you understand from Mr. Waller that it wouldn't be possible to judge the deliverables in the first 30 days because of startup work?	15:14	11	A. Um-hum.	15:16
12		15:14	12	Q. And then you say: "Interesting thought. He has sensed my disappointment with him."	15:16
13		15:14	13	Do you see that?	15:16
14	MR. GRENDI: Objection to the form.	15:14	14	A. Yes.	15:16
15	MR. GAVENMAN: Objection.	15:14	15	Q. What did you mean by that?	15:16
16	THE WITNESS: Did I -- did I understand?	15:14	16		15:16
17	BY MR. GREIM:	15:14	17		15:16
18	Q. Yes?	15:14	18		15:16
19	A. From this E-mail?	15:14	19		15:16
20	Q. Yeah. Back to 67 is the easiest place to see it.	15:14	20		15:16
21		15:14	21		15:16
22		15:14	22		15:16

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<p>1 A. I always correct him and maybe I didn't 15:16 2 see, you know, I would accept his offer to work for 15:16 3 him. 15:16 4 Q. Well, you say you'd always correct him, 15:16 5 but in what sense were you disappointed with him? 15:16 6 A. I -- let's see. In one sense, he won't 15:16 7 listen to me, to my advice. That's the main reason. 15:16 8 We have a political agenda, you know, we both agree 15:16 9 to push, and I always gave advice, I think sound 15:16 10 advice. He just wouldn't listen to me. 15:17 11 Q. Is there anyone he does listen to? 15:17 12 A. No. 15:17 13 MR. GAVENMAN: Objection, form. 15:17 14 MR. GRENDI: Objection. 15:17 15 BY MR. GREIM: 15:17 16 Q. Then you see Mr. Waller responds: "If 15:17 17 you aren't part of the deal, I don't want to be 15:17 18 either." 15:17 19 A. Yes. 15:17 20 Q. "Anybody who is friends with Bernie and 15:17 21 Judd is my kind of person." 15:17 22 Who is Judd? 15:17 </p>	<p>1 want to reveal our work to anybody else." 15:18 2 Do you see that? 15:18 3 A. Yes. 15:18 4 Q. Do you remember Strategic Vision 15:18 5 generally being concerned about others learning about 15:18 6 this project? 15:18 7 A. Right. 15:18 8 MR. GAVENMAN: Objection. 15:18 9 BY MR. GREIM: 15:18 10 Q. Do you recall them being concerned that 15:18 11 their research teams or research methods might be 15:18 12 exposed to others? 15:18 13 MR. GAVENMAN: Objection. 15:18 14 MR. GRENDI: Objection. 15:18 15 THE WITNESS: Yes. 15:18 16 BY MR. GREIM: 15:18 17 Q. And did you understand that they felt 15:18 18 that you were the most trustworthy person on the 15:18 19 other side of the contract? 15:18 20 MR. GAVENMAN: Objection. 15:18 21 MR. GRENDI: Objection. 15:18 22 THE WITNESS: Yes. 15:18 </p>
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<p>1 A. Judd is my boss, a senator from New 15:17 2 Hampshire. 15:17 3 Q. Oh, okay. Well, then you respond: "He 15:17 4 thinks this will protect me." 15:17 5 Right? 15:17 6 A. Yes. 15:17 7 Q. And do you remember Mr. Guo saying that? 15:17 8 A. Because -- 15:17 9 MR. GAVENMAN: Objection to form. 15:17 10 MR. GRENDI: Objection. 15:17 11 THE WITNESS: I think this is, you know, like 15:17 12 several days, kind of different days, and then he 15:17 13 didn't want me to sign. He said, you know, the 15:17 14 reason I didn't want you to get involved because I 15:17 15 want to protect you. 15:17 16 BY MR. GREIM: 15:17 17 Q. Then you see -- go to the next page, 70. 15:17 18 Mr. Waller says: "Protect you from what? Any 15:18 19 attempt to do anything in court will expose 15:18 20 everything and that isn't worth a lousy million 15:18 21 dollars for either party. Do you see a necessity on 15:18 22 your part to have some else as a signer? I don't 15:18 </p>	<p>1 BY MR. GREIM: 15:18 2 Q. You see, next, Mr. Waller maybe senses 15:18 3 something. So he says: "What is your preference?" 15:19 4 And your response is that you don't really 15:19 5 care; is that right? 15:19 6 A. Right. 15:19 7 Q. Were you actually willing to sign the 15:19 8 contract if you had to? 15:19 9 A. Yes. 15:19 10 Q. If you had, do you know who would have 15:19 11 paid for it? 15:19 12 A. I don't. 15:19 13 Q. Do you see Mr. Waller say in response: 15:19 14 "I don't want some stranger signing it who doesn't 15:19 15 know what he's talking about and will jerk us around. 15:19 16 We must report to you and only you for quality 15:19 17 control." 15:19 18 A. Um-hum. 15:19 19 Q. Then you thank Mr. Waller for his trust. 15:19 20 A. Um-hum. 15:19 21 Q. Mr. Han, do you think that there was a 15:19 22 misunderstanding between Mr. Guo and Strategic Vision 15:19 </p>

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<p>1 about exactly what the initial reports were supposed 15:20 2 to show? 15:20 3 MR. GRENDI: Objection. 15:20 4 MR. GAVENMAN: Objection, form. 15:20 5 THE WITNESS: Whether there is a 15:20 6 miscommunication or misunderstanding? 15:20 7 BY MR. GREIM: 15:20 8 Q. Let's -- my question was 15:20 9 misunderstanding. So let's start with that. 15:20 10 MR. GAVENMAN: Object to form. 15:20 11 MR. GRENDI: Same objection. 15:20 12 THE WITNESS: I'm not sure. It might be, but 15:20 13 the contract made it clear. The provision is clear 15:20 14 and maybe the expectation is different. 15:20 15 BY MR. GREIM: 15:20 16 Q. Who negotiated the actual language of 15:20 17 the contract? 15:20 18 A. I was -- most of the part, I was 15:20 19 involved and then later stage, I don't know specific 15:20 20 what's really in there and they changed very much. 15:20 21 So I didn't look into it after that. 15:21 22 Q. Do you recall Strategic Vision being 15:21 </p>	<p>1 MR. GAVENMAN: Objection. 15:21 2 MR. GRENDI: Objection. 15:21 3 THE WITNESS: I don't. 15:21 4 BY MR. GREIM: 15:21 5 Q. I mean did you at the time? 15:21 6 A. I didn't. 15:21 7 MR. GAVENMAN: Objection. 15:22 8 BY MR. GREIM: 15:22 9 Q. Why is that? 15:22 10 A. Because, as I said before, Yvette has 15:22 11 been a trusted assistant of Miles for 16 years. 15:22 12 Q. How well did you know Yvette Wang at 15:22 13 this time? 15:22 14 A. Huh? 15:22 15 Q. How well did you know Yvette Wang at 15:22 16 this time? 15:22 17 A. I knew her history and I saw -- I 15:22 18 observed how they interact with each other and her 15:22 19 command of the office. So I think she's a key person 15:22 20 in Miles' life and business. 15:22 21 Q. Did you know her full background? 15:22 22 MR. GRENDI: Objection. 15:22 </p>
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<p>1 concerned that Mr. Guo would release information 15:21 2 prematurely and put the project in danger? 15:21 3 MR. GRENDI: Objection. 15:21 4 MR. GAVENMAN: Objection. 15:21 5 THE WITNESS: Yes. 15:21 6 BY MR. GREIM: 15:21 7 Q. Do you recall that that's another reason 15:21 8 why Strategic Vision wanted to report to you instead 15:21 9 of someone else? 15:21 10 MR. GAVENMAN: Objection. 15:21 11 THE WITNESS: Yes. 15:21 12 BY MR. GREIM: 15:21 13 Q. Do you recall Strategic Vision being 15:21 14 very concerned that Yvette Wang was inserted into the 15:21 15 discussions just before the finalization of the 15:21 16 property contract? 15:21 17 MR. GRENDI: Objection. 15:21 18 MR. GAVENMAN: Objection. 15:21 19 THE WITNESS: Yes. 15:21 20 BY MR. GREIM: 15:21 21 Q. Did you share Strategic Vision's 15:21 22 concern? 15:21 </p>	<p>1 MR. GAVENMAN: Objection. 15:22 2 THE WITNESS: No. I know a little bit, Miles 15:22 3 mentioned to me. 15:23 4 BY MR. GREIM: 15:23 5 Q. Do you independently know about her 15:23 6 background? 15:23 7 A. I didn't. 15:23 8 MR. GAVENMAN: Objection. 15:23 9 MR. GRENDI: Objection. 15:23 10 BY MR. GREIM: 15:23 11 Q. Is it your understanding that every 15:23 12 person in Miles' office -- I'm sorry. Now I'm 15:23 13 calling him Miles. 15:23 14 A. Yeah. Yeah. 15:23 15 Q. Was it your understanding that everyone 15:23 16 in Mr. Guo's office reported to Ms. Wang? 15:23 17 MR. GRENDI: Objection. 15:23 18 MR. GAVENMAN: Objection, form. 15:23 19 THE WITNESS: Not everybody, but I think most 15:23 20 of them. 15:23 21 BY MR. GREIM: 15:23 22 Q. If you look at your response to Mr. 15:23 </p>
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<p>1 Waller's E-mail of concern -- or I'm sorry -- text of 15:24 2 concern, which is at SVUS000072, you see he discusses 15:24 3 the concerns that we just talk about. 15:24 4 A. Yeah. 15:24 5 Q. Then you can see your response at 10:20 15:24 6 on December 28: "I appreciate your trust. I think 15:24 7 it is important to get him to sign the contract." 15:24 8 Are you talking about Mr. Guo? 15:24 9 A. Yes. 15:24 10 Q. You see we can work on security later. 15:24 11 He wants me to work for him exclusively, which I have 15:24 12 to think about. 15:24 13 A. Correct. 15:24 14 Q. So is it something you were still 15:24 15 considering on December 28th? 15:24 16 MR. GRENDI: Objection. 15:24 17 MR. GAVENMAN: Objection. 15:24 18 THE WITNESS: Yes. 15:24 19 BY MR. GREIM: 15:24 20 Q. When did you decide that it was 15:24 21 something you really did not want to do? 15:24 22 MR. GRENDI: Objection. 15:24 </p>	<p>1 A. Yes. 15:26 2 Q. Now let me stop you there for a second. 15:26 3 Do you see that above that, back on December 28th, 15:26 4 you had forecast that Yvette wanted to talk about the 15:26 5 deposit? 15:26 6 MR. GAVENMAN: Objection. 15:26 7 MR. GRENDI: Objection. 15:26 8 MR. GAVENMAN: Form. 15:26 9 THE WITNESS: Which? 15:26 10 BY MR. GREIM: 15:26 11 Q. If you look, we're on 73. 15:26 12 A. Yeah. 15:26 13 Q. If you go right above there, that's on 15:26 14 December 30th. Go back to the 28th. 15:26 15 You see he asks you, he says: "Okay. Do you 15:26 16 think the contract will be signed today?" 15:26 17 And then you say: "Don't know. I think he 15:26 18 wants to talk about the deposit." 15:26 19 A. Right. 15:26 20 Q. So does that make you think maybe you 15:26 21 were privy to discussions between Yvette and Mr. Guo 15:26 22 before she was sent down to sign the contract? 15:26 </p>
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<p>1 MR. GAVENMAN: Objection. 15:24 2 THE WITNESS: I have no idea when. 15:24 3 BY MR. GREIM: 15:24 4 Q. Even while Yvette Wang was negotiating 15:24 5 with Strategic Vision, were you still getting some 15:25 6 information about the negotiations? 15:25 7 MR. GRENDI: Objection. 15:25 8 MR. GAVENMAN: Objection. 15:25 9 THE WITNESS: Not from Miles, but from French 15:25 10 and Mike a little bit. 15:25 11 BY MR. GREIM: 15:25 12 Q. Right. 15:25 13 A. Whatever they could share. 15:25 14 Q. So if you look, for example, at the 15:25 15 bottom of SVUS000073, you see Mike reaches out and 15:25 16 says "Please call F". Is that French? 15:25 17 A. Yes. 15:26 18 Q. We agreed on the deposit. That wasn't 15:26 19 a problem. However, today, Y came back with major, 15:26 20 reasonable changes to thing that we had agreed in 15:26 21 writing on December 12th." 15:26 22 Do you see that? 15:26 </p>	<p>1 A. Absolutely no. 15:27 2 MR. GRENDI: Objection. 15:27 3 MR. GAVENMAN: Objection. 15:27 4 THE WITNESS: No. 15:27 5 BY MR. GREIM: 15:27 6 Q. No? 15:27 7 A. No. I'm pretty sure about that. 15:27 8 Q. Okay. And let's now move to 74. After 15:27 9 Mr. Waller raises his concern about changes being 15:27 10 proposed by Yvette, you see you respond later that 15:27 11 day on the 30th and you say: "I talked with F." 15:27 12 That's French. Right? 15:27 13 A. Yes. 15:27 14 Q. It's better to wait a couple of days. 15:27 15 Miles -- that's Mr. Guo? 15:27 16 A. Yes. 15:27 17 Q. Communicated with me a few times today, 15:27 18 but did not mention the failure. 15:27 19 A. Right. 15:27 20 Q. Did you see that? 15:27 21 A. Yes. 15:27 22 Q. Now, do you think it's possible that Mr. 15:27 </p>

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1	Guo didn't know about the interaction between	15:27	1	Q. I guess I'll tell you this. Feel free	15:31
2	Ms. Wang and French?	15:27	2	to look at the agreement if you want to. What I	15:31
3	MR. GAVENMAN: Objection to form.	15:27	3	really wanted to ask is if you could remember having	15:31
4	MR. GRENDI: Objection.	15:27	4	an understanding about it.	15:31
5	THE WITNESS: I have no idea. I don't think	15:27	5	A. About the deposit?	15:31
6	it's possible.	15:27	6	Q. About the deposit.	15:31
7	MR. GREIM: Okay. Now, earlier, I	15:27	7	A. I didn't know the end result of what	15:31
8	represented to you that the agreement was signed on	15:28	8	they put in the signed form.	15:31
9	January 6th. I'm going to show -- we're going to go	15:28	9	Q. Okay. Then what about the contents of	15:31
10	ahead and mark this even though it's been used	15:28	10	the weekly reports; did you have an understanding	15:31
11	before. I'll just mark it again. I'm going to show	15:28	11	about -- if you want to look at the agreement because	15:32
12	you what we're marking as Han Exhibit 11.	15:29	12	you think it will refresh your memory, do it. That's	15:32
13	[Han Exhibit No. 11 was	15:29	13	fine, but I first want to ask you did you have an	15:32
14	marked for identification.]	15:29	14	understanding about what was going to be in those	15:32
15	BY MR. GREIM:	15:29	15	weekly reports?	15:32
16	Q. I'll represent to you that this is the	15:29	16	MR. GRENDI: Objection to the form.	15:32
17	final signed agreement. Could you turn to page 5.	15:29	17	MR. GAVENMAN: Objection.	15:32
18	It's labeled Eastern-000009.	15:29	18	THE WITNESS: I have a rough idea, because I	15:32
19	Can you tell us the name that is signed there	15:29	19	think we discussed during the meeting he wants	15:32
20	for Eastern Profit?	15:29	20	something of substance, not, you know, junk	15:32
21	MR. GRENDI: Objection.	15:29	21	information, and that, I'm pretty sure.	15:32
22	THE WITNESS: It looks like Han G. Wang, but	15:29	22	BY MR. GREIM:	15:32
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1	it's script. It's hard to tell, but it looks like --	15:29	1	Q. Do you recall, though, the idea that	15:32
2	it's hard to tell, but maybe it's Han.	15:29	2	there would be a ramp-up period, as Mr. Waller texted	15:32
3	BY MR. GREIM:	15:30	3	to you --	15:32
4	Q. Does it look like Yanping Wang?	15:30	4	A. Yes.	15:32
5	A. No.	15:30	5	Q. -- in which the reports would not be the	15:32
6	Q. What's the date that you seen underneath	15:30	6	same as the reports that would come later?	15:32
7	it?	15:30	7	MR. GRENDI: Objection to form.	15:32
8	A. January 6th.	15:30	8	MR. GAVENMAN: Objection.	15:32
9	Q. Did you understand whether the deposit	15:30	9	THE WITNESS: He mentioned that to me. I	15:32
10	would be refundable?	15:30	10	also expressed my concern, those types, because the	15:33
11	MR. GAVENMAN: Objection, form.	15:31	11	assignments, the target is very clear. So there's no	15:33
12	MR. GRENDI: Objection.	15:31	12	point going around and around for those information	15:33
13	THE WITNESS: I don't know. Where is it in	15:31	13	that the client already has. I made that point so	15:33
14	the paper, in the document?	15:31	14	many times in the past.	15:33
15	BY MR. GREIM:	15:31	15	BY MR. GREIM:	15:33
16	Q. If you see on page 5, under Payment	15:31	16	Q. Do you recall after an initial meeting	15:33
17	Terms --	15:31	17	that the start date of the contract was postponed?	15:33
18	A. Yeah.	15:31	18	A. Say that again.	15:33
19	Q. -- that's the reference that I see, but	15:31	19	Q. Do you recall that after an initial	15:33
20	I don't want to suggest to you an answer.	15:31	20	meeting that the start date of the contract was	15:33
21	[Witness peruses exhibit.]	15:31	21	postponed?	15:33
22	BY MR. GREIM:	15:31	22	A. I was not involved in that. So I don't	15:33
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<p>1 recall specifically. There are some glitches, you 15:34 2 know, like something going. I also remember French 15:34 3 told me in the middle, you know, the wire transfer 15:34 4 and Miles tried to stop the second payment. 15:34 5 Q. I'm going to be -- make sure I'm a clear 15:34 6 on a couple of questions about representations. I 15:34 7 know we covered these much earlier today, but I want 15:34 8 to make sure I've got them. 15:34 9 A. Yeah. 15:34 10 Q. Did Guo represent to Strategic Vision 15:34 11 that he was a dissident? 15:34 12 MR. GAVENMAN: Objection, form. 15:34 13 MR. GRENDI: Objection to form. 15:34 14 THE WITNESS: I don't think he specifically 15:34 15 said he's a dissident, but I think he made his 15:35 16 intention clear to them that he's anti-CCP. This is 15:35 17 the agenda. The reason we're doing this is to 15:35 18 disrupt the regime. 15:35 19 BY MR. GREIM: 15:35 20 Q. And when you say disrupt the regime, 15:35 21 what do you mean by that? 15:35 22 A. Just expose them to corruption, to the 15:35 </p>	<p>1 and Rule of Law and perfectly, he mentioned many 15:37 2 times to me that he strongly opposed to CGP's 15:37 3 dictatorship. 15:37 4 Q. When did he move from second to the 15:37 5 third phase, overthrow CCP? 15:37 6 MR. GRENDI: Objection to form. 15:37 7 MR. GAVENMAN: Objection to form. 15:37 8 THE WITNESS: I don't remember specifically. 15:37 9 We can go back and look at the timeline, but I don't 15:37 10 remember. 15:37 11 BY MR. GREIM: 15:37 12 Q. Did you observe the information that was 15:37 13 loaded onto hard drives given by Yvette Wang to 15:37 14 French Wallop? 15:38 15 MR. GAVENMAN: Objection to form. 15:38 16 MR. GRENDI: Objection to form. 15:38 17 THE WITNESS: I think it might be -- Mike 15:38 18 shoot me. I don't specifically remember. Maybe I 15:38 19 recall that, but it's all junk, full of junk. I was 15:38 20 disappointed with that. I expressed my 15:38 21 disappointment to Mike. It doesn't advance our 15:38 22 agenda. It doesn't help the deliverables. 15:38 </p>
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<p>1 scandals so that people will see the nature of the 15:35 2 Communist regime and even disturb internal power 15:35 3 struggle among the leaders. 15:35 4 Q. Did he say it was his goal to actually 15:35 5 overthrow the Communist Part? 15:35 6 MR. GAVENMAN: Objection to form. 15:35 7 MR. GRENDI: Objection to form. 15:35 8 THE WITNESS: That, I didn't remember 15:36 9 specifically. I think Miles has been involved from 15:36 10 the original -- you know, the beginning of the 19 -- 15:36 11 2017 to this later stage. 15:36 12 Until now, there's an evolution going on with 15:36 13 him. He's political agenda are slight different in 15:36 14 each stage. 15:36 15 BY MR. GREIM: 15:36 16 Q. What do you mean by that? 15:36 17 A. From the very beginning, you know, I 15:36 18 think he is trying to protect his family, his 15:36 19 employees, and his assets, his own life, and revenge. 15:36 20 That's the goals, three goals, he proposed, and that 15:36 21 later evolved into anti-CCP, but still support CGP. 15:36 22 Now he's moved along that line to overthrow the CCP 15:37 </p>	<p>1 Yes. I think I saw it. 15:38 2 BY MR. GREIM: 15:38 3 Q. I'm sorry. My question was different 15:38 4 though. 15:38 5 A. Okay. Sorry. 15:38 6 Q. My question was whether you saw the hard 15:38 7 drives that Yvette Wang gave to French Wallop with 15:38 8 the initial information to begin the research? 15:38 9 A. Oh, no. Maybe -- 15:38 10 MR. GRENDI: Objection to the form. 15:38 11 MR. GAVENMAN: Objection to form. 15:38 12 THE WITNESS: Maybe French shoot me, but 15:38 13 French mentioned that when he installed, there some 15:38 14 weird stuff going on. 15:39 15 BY MR. GREIM: 15:39 16 Q. Did you -- do you remember hearing that 15:39 17 there was Malware in the drives? 15:39 18 A. That's what French told me. 15:39 19 MR. GAVENMAN: Objection to form. 15:39 20 THE WITNESS: I have not -- yeah. 15:39 21 BY MR. GREIM: 15:39 22 Q. Did you realize that that required 15:39 </p>

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<p>1 French to go back to New York to get a second set of 15:39 2 drives from the Yvette? 15:39 3 MR. GRENDI: Objection. 15:39 4 THE WITNESS: That's what she told me. 15:39 5 BY MR. GREIM: 15:39 6 Q. Did Yvette or Mr. Guo ever talk to you 15:39 7 about that? 15:39 8 A. Never. 15:39 9 Q. At some point, do you remember Mr. 15:39 10 Waller or Ms. Wallop telling you that a second team 15:39 11 would be hired to crosscheck the first team that was 15:39 12 doing the research? 15:39 13 A. Yes. I think Mike mentioned it. 15:39 14 Q. And do you remember that that second 15:39 15 team was in Texas? 15:39 16 A. That was later on, not at the time he 15:40 17 told me the second team. 15:40 18 Q. Do you recall that that team was called 15:40 19 ASOG? 15:40 20 A. No. 15:40 21 MR. GAVENMAN: Objection. 15:40 22 BY MR. GREIM: 15:40 </p>	<p>1 and ask him how they should proceed? 15:41 2 MR. GRENDI: Objection, form. 15:41 3 THE WITNESS: I think they did, yes. 15:41 4 BY MR. GREIM: 15:41 5 Q. And did you then convey the information 15:41 6 to Mr. Guo? 15:41 7 A. Yes. 15:41 8 Q. Did you give a response to Strategic 15:41 9 Vision from Mr. Guo? 15:41 10 MR. GAVENMAN: Objection to form. 15:41 11 MR. GRENDI: Objection to form. 15:41 12 BY MR. GREIM: 15:41 13 Q. Well, let me -- I'm sorry. I skipped a 15:41 14 point. 15:41 15 MR. GRENDI: Yeah. 15:41 16 BY MR. GREIM: 15:41 17 Q. Did Mr. Guo respond to you in any way 15:41 18 when you conveyed this information to him? 15:41 19 MR. GRENDI: Objection to form. 15:41 20 MR. GAVENMAN: Objection, form. 15:41 21 THE WITNESS: I didn't remember exactly what 15:41 22 was the response, how he reacted to it. I remember 15:41 </p>
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<p>1 Q. And did you know how much that team 15:40 2 billed Strategic Vision for its work? 15:40 3 MR. GAVENMAN: Objection. 15:40 4 THE WITNESS: I have no idea. 15:40 5 BY MR. GREIM: 15:40 6 Q. Do you recall that Strategic Vision 15:40 7 reported back to you on the records protected 15:40 8 designation of the subjects? 15:40 9 MR. GRENDI: Objection. 15:40 10 MR. GAVENMAN: Objection, form. 15:40 11 THE WITNESS: I remember that. 15:40 12 BY MR. GREIM: 15:40 13 Q. What did Strategic Vision tell you? 15:40 14 MR. GAVENMAN: Objection, form. 15:40 15 THE WITNESS: French told me that there are 15:40 16 five people. They weren't sure how many people are 15:40 17 under this protection, that nobody can touch them, 15:40 18 and my response was there are so many other people 15:40 19 that we still can get information. 15:41 20 BY MR. GREIM: 15:41 21 Q. Do you recall that Strategic Vision 15:41 22 asked you to take that information back to Mr. Guo 15:41 </p>	<p>1 he was angry about it, because they were supposed to 15:41 2 be deliverables, never turned out, and I think he 15:41 3 suspected this is an excuse from Strategic Vision. 15:41 4 BY MR. GREIM: 15:42 5 Q. So did Mr. Guo then provide guidance on 15:42 6 what Strategic Vision should do with those names or 15:42 7 provide new names? 15:42 8 A. No. 15:42 9 MR. GRENDI: Object to the form. 15:42 10 THE WITNESS: He just was angry, you know, 15:42 11 like I didn't get any -- I didn't remember any 15:42 12 instruction he gave me. 15:42 13 BY MR. GREIM: 15:42 14 Q. Do you recall that Strategic Vision 15:42 15 reported to you that Team 2 had, nonetheless, found a 15:42 16 counterfeit U.S. passport ring? 15:42 17 A. Yes. 15:42 18 MR. GAVENMAN: Objection. 15:42 19 BY MR. GREIM: 15:42 20 Q. Do you recall that they reported to you 15:42 21 that they had found Social Security and tax fraud? 15:42 22 MR. GAVENMAN: Objection to form. 15:42 </p>
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1	MR. GRENDI: Objection to the form.	15:42	1	second week, but he wants to see you're able to get	15:44
2	THE WITNESS: Yes.	15:42	2	this information as you said.	15:44
3	BY MR. GREIM:	15:42	3	Q. Do you recall whether Mr. Guo had some event or some specific reason for wanting to have information within the first couple of weeks?	15:44
4	Q. Do you recall that Strategic Vision reported to you that they had found Customs fraud?	15:42	4	15:45	
5	15:42	5	15:45		
6	MR. GRENDI: Objection to form.	15:42	6	MR. GRENDI: Objection to form.	15:45
7	MR. GAVENMAN: Objection to form.	15:42	7	MR. GAVENMAN: Objection to form.	15:45
8	THE WITNESS: Yes.	15:42	8	THE WITNESS: No. I think he wants to get,	15:45
9	BY MR. GREIM:	15:42	9	you know, his money's worth. I think also -- this is	15:45
10	Q. Do you recall that Strategic Vision reported to you that they had found possible human trafficking?	15:42	10	just my speculation, that he planned to have a global	15:45
11	15:42	11	15:45		
12	MR. GAVENMAN: Objection to form.	15:42	12	press conference. I don't know if he's planning to	15:45
13	MR. GRENDI: Objection to form.	15:42	13	15:45	
14	THE WITNESS: Yes.	15:42	14	be comfortable when he do this, you know, global	15:45
15	BY MR. GREIM:	15:42	15	press release conference.	15:45
16	Q. And did you report those facts to Mr. Guo?	15:42	16	Q. Did he disclose that conference to Strategic Vision?	15:45
17	15:42	17	15:45		
18	A. Yes.	15:42	18	MR. GAVENMAN: Objection to form.	15:45
19	Q. What was his response?	15:42	19	THE WITNESS: I don't know.	15:45
20	A. He -- I forgot. I cannot recall exactly	15:42	20	MR. GRENDI: Objection to form.	15:45
21	his reaction, but my impression now, I think he	15:43	21	THE WITNESS: Not in my presence. I don't	15:45
22			22	recall that, I should say.	15:46
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1	didn't understand the significance of this	15:43	1	BY MR. GREIM:	15:46
2	information and he's so into whatever is in the	15:43	2	Q. Do you believe that -- or, well, let me	15:46
3	contract, you know, bank statements, how they --	15:43	3	-- I'll strike that. Did Mr. Guo ever end up getting	15:46
4	money transferred, that type of information. That's	15:43	4	research on these 15 individuals and using it for the	15:46
5	just my guess.	15:43	5	purposes that he claimed he would use it?	15:46
6	Q. So did Mr. Guo tell you that he believed	15:43	6	MR. GRENDI: Objection to the form.	15:46
7	that within the first week or two, he would be	15:43	7	MR. GAVENMAN: Objection.	15:46
8	getting actual bank statements for the subjects?	15:43	8	THE WITNESS: Please rephrase that.	15:46
9	A. Say that again.	15:43	9	BY MR. GREIM:	15:46
10	Q. Did Mr. Guo tell you that within the	15:43	10	Q. Sure. Did Mr. Guo ever end up getting	15:46
11	first week or two, he thought he would be getting	15:43	11	information on the 15 individuals and then using it	15:46
12	actual bank statements for the subjects?	15:44	12	for the purposes he claimed he was going to use	15:46
13	A. No. I think he wants to see whatever is	15:44	13	Strategic Vision's research?	15:46
14	in the contract, not just bank accounts. I'm just	15:44	14	MR. GRENDI: Objection to the form.	15:46
15	using that as an example.	15:44	15	MR. GAVENMAN: Objection.	15:46
16	Q. Sure.	15:44	16	THE WITNESS: That's a hypothetic question.	15:46
17	A. Because there are three or four	15:44	17	BY MR. GREIM:	15:46
18	different categories of information. He wants to	15:44	18	Q. Well, no. I wonder if it actually	15:46
19	see, you know, the progress each time, each month,	15:44	19	happened?	15:46
20	each week that there is a progress on those type of	15:44	20	A. No. It never happened, because the	15:46
21	information. I don't think he expected to get, you	15:44	21	information is not what he's asking for.	15:47
22	know, like good intelligence in the first week or	15:44	22	Q. But did he ever go to somebody else --	15:47
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<p>1 A. I don't know. 15:47</p> <p>2 Q. -- and get the research and then go 15:47</p> <p>3 expose Chinese Communist leaders? 15:47</p> <p>4 MR. GRENDI: Objection to form. 15:47</p> <p>5 MR. GAVENMAN: Objection to form. 15:47</p> <p>6 THE WITNESS: I'm not aware of that. 15:47</p> <p>7 BY MR. GREIM: 15:47</p> <p>8 Q. Do you recall Strategic Vision asking 15:47</p> <p>9 you to ask Guo to provide some non-records-protected 15:47</p> <p>10 names? 15:47</p> <p>11 MR. GRENDI: Objection to form. 15:47</p> <p>12 THE WITNESS: I don't know that. Say that 15:47</p> <p>13 again. Non-record? 15:47</p> <p>14 BY MR. GREIM: 15:47</p> <p>15 Q. Do you recall that Strategic Vision 15:47</p> <p>16 asked you to ask Guo to provide some 15:47</p> <p>17 non-records-protected names? 15:47</p> <p>18 MR. GRENDI: Objection to the form. 15:47</p> <p>19 THE WITNESS: I don't remember, but there's 15:47</p> <p>20 plenty in this list that is not protected. 15:47</p> <p>21 BY MR. GREIM: 15:47</p> <p>22 Q. Do you know that? 15:48</p>	<p>1 we still have many left. I mean here, the many left, 15:49</p> <p>2 but we didn't get anything. 15:49</p> <p>3 Q. So when you said we have many left, it's 15:49</p> <p>4 your testimony you're referring to people who are not 15:49</p> <p>5 part of 15 whose names might have appeared? 15:49</p> <p>6 A. No, no, no. If you read this, 82, page 15:49</p> <p>7 82, I said even there are five RP people, that means 15:49</p> <p>8 people in this list that's under protection. There 15:49</p> <p>9 are -- we still have many left. That means many in 15:49</p> <p>10 this list that left, we can go after them, but I said 15:49</p> <p>11 we didn't get anything. I mean they didn't do 15:49</p> <p>12 anything to collect that information. It put me in a 15:49</p> <p>13 very difficult spot. 15:49</p> <p>14 More importantly, it failed to advance our 15:49</p> <p>15 agenda. So that's what said this project to do, to 15:50</p> <p>16 get information to expose the corruption of Chinese 15:50</p> <p>17 Communist, you know, high-ranking officials. 15:50</p> <p>18 Q. I guess -- 15:50</p> <p>19 A. That's what I was upset about. 15:50</p> <p>20 Q. Right, but I guess my question to you is 15:50</p> <p>21 how do you know they were not gathering that 15:50</p> <p>22 information? 15:50</p>
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<p>1 A. Yeah, because they told me they have 15:48</p> <p>2 four or five people that is under, you know, the 15:48</p> <p>3 protection, but there's so many here. Even they said 15:48</p> <p>4 15, but there's plenty, because Miles tried to stack 15:48</p> <p>5 more names into this research project. 15:48</p> <p>6 Q. So did you tell Strategic Vision that it 15:48</p> <p>7 should just move on and start investigating other 15:48</p> <p>8 members of the family tree? 15:48</p> <p>9 A. Yes. It's in here. 15:48</p> <p>10 MR. GAVENMAN: Objection to form. 15:48</p> <p>11 THE WITNESS: I think in the texts made it 15:48</p> <p>12 very specific. 15:48</p> <p>13 BY MR. GREIM: 15:48</p> <p>14 Q. Let's see. Show me where you're 15:48</p> <p>15 pointing to. 15:48</p> <p>16 A. I don't remember, but it's in here. 15:48</p> <p>17 Q. Okay. I would like to go -- because you 15:48</p> <p>18 pointed to your text. I would like to see where you 15:48</p> <p>19 provided that advice. It would have to be -- 15:48</p> <p>20 A. Okay. Let me see. Like, for example, 15:48</p> <p>21 in 82, I discuss with French, said I'm disappointed 15:48</p> <p>22 with the result. Ever there are five RP people, but 15:49</p>	<p>1 A. Because they told me they only found 15:50</p> <p>2 five or four. They are not sure how many actually 15:50</p> <p>3 are in this PR under protection, but if they only 15:50</p> <p>4 found two, I mean, or four or five, there's so many 15:50</p> <p>5 here. 15:50</p> <p>6 Q. Didn't they go and get information on 15:50</p> <p>7 someone named Frank Swen? 15:50</p> <p>8 MR. GRENDI: Objection. 15:50</p> <p>9 MR. GAVENMAN: Objection to form. 15:50</p> <p>10 THE WITNESS: But that's not information in 15:50</p> <p>11 the contract. The information is only on surface, 15:50</p> <p>12 some kind of, you know, like use the, you know, 15:50</p> <p>13 Social Security account, maybe some passport issue. 15:50</p> <p>14 It's not the information. You know, they touched 15:51</p> <p>15 some things, but not the information, you know, as 15:51</p> <p>16 specified. 15:51</p> <p>17 BY MR. GREIM: 15:51</p> <p>18 Q. Let me ask you this: Your text says and 15:51</p> <p>19 you've been saying today that only five are records 15:51</p> <p>20 protected. 15:51</p> <p>21 A. That's what they told me. 15:51</p> <p>22 Q. That's -- well, I think you're reading 15:51</p>

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<p>1 your text. My question is are you certain that they 15:51 2 said that only five of the 15 were records protected? 15:51 3 A. Yes. They told me four to five. I said 15:51 4 exactly. I asked this question how many specifically 15:51 5 under protected. They said so far, there's four or 15:51 6 five that were not. They don't know the exact 15:51 7 number. 15:51 8 Q. So your testimony is that your response 15:51 9 was to go and find information on others of the 15 15:51 10 who are not records protected? 15:51 11 A. Correct. 15:51 12 Q. Okay. Okay. And your recollection is, 15:51 13 simply, that they did not report that all 15 were 15:51 14 records protected? 15:52 15 MR. GRENDI: Objection. 15:52 16 MR. GAVENMAN: Objection to form. 15:52 17 THE WITNESS: My impression is what? 15:52 18 BY MR. GREIM: 15:52 19 Q. Your recollection is that there were 15:52 20 some who were not records protected; is that right? 15:52 21 A. Correct. 15:52 22 Q. Okay. Do you believe that if Strategic 15:52 </p>	<p>1 answer that. It calls for a legal conclusion. 15:53 2 MR. GREIM: I don't think you can just 15:53 3 instruct the witness not to answer. He's been 15:53 4 allowed to answer many, many questions about the 15:53 5 contract. 15:53 6 BY MR. GREIM: 15:53 7 Q. So my question is -- I'm not going to 15:53 8 ask you to read the contract and give me a legal 15:53 9 opinion. My question is do you recall that part of 15:54 10 the deal was that if they got in and they ran into 15:54 11 unexpected difficulties, the parties would work 15:54 12 together to find a solution? 15:54 13 MR. GAVENMAN: Objection. 15:54 14 MR. GRENDI: Objection to the form. 15:54 15 MR. GAVENMAN: From, calls for a legal 15:54 16 conclusion. 15:54 17 THE WITNESS: This is not -- 15:54 18 MR. GAVENMAN: You shouldn't answer if it 15:54 19 calls for a legal conclusion. You're not here to 15:54 20 offer that. 15:54 21 THE WITNESS: I think that provision was not 15:54 22 under my -- when I negotiate this, it was not in 15:54 </p>
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<p>1 Vision had simply been allowed to continue its 15:52 2 startup process that it would have been able to 15:52 3 produce the reports under the contract? 15:52 4 MR. GAVENMAN: Objection to form. 15:52 5 MR. GRENDI: Objection to form. 15:52 6 THE WITNESS: I'm speculating and I think 15:52 7 maybe. I think they underestimate -- I mean they 15:53 8 overestimate their capacity. I also overestimated 15:53 9 their capacity, underestimated the CCP's, you know, 15:53 10 coverup. 15:53 11 BY MR. GREIM: 15:53 12 Q. Well, doesn't the agreement contain a 15:53 13 provision that if things are more difficult than 15:53 14 expected, the parties will work together to adjust? 15:53 15 MR. GRENDI: Objection. 15:53 16 MR. GAVENMAN: Objection to form. It 15:53 17 actually calls for a legal conclusion as well, which 15:53 18 I don't think he's here to offer. So you shouldn't 15:53 19 answer that. 15:53 20 BY MR. GREIM: 15:53 21 Q. Do you recall that? 15:53 22 MR. GAVENMAN: Same objection. Please don't 15:53 </p>	<p>1 there. So I didn't know. 15:54 2 BY MR. GREIM: 15:54 3 Q. You don't recall that provision? 15:54 4 A. No. 15:54 5 Q. Did Strategic Vision make any 15:54 6 representations to you -- 15:54 7 A. Yeah. 15:55 8 Q. -- that you think were false? 15:55 9 A. No. 15:55 10 Q. Did you hear that they made 15:55 11 representations to Mr. Guo or maybe to Ms. Wang that 15:55 12 were false, fraudulent? 15:55 13 A. No. 15:55 14 Q. Did you discuss with Mr. Guo or 15:55 15 Mrs. Wang whether to terminate the contract with 15:55 16 Strategic Vision? 15:55 17 A. Never. 15:55 18 Q. You were not involved in that 15:55 19 discussion? 15:55 20 A. No. 15:55 21 Q. When did they finally tell you that they 15:55 22 were terminating the contract? 15:55 </p>

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1	MR. GRENDI: Objection to the form.	15:55	1	Q. We're getting too conversational, Mr. Han.	15:57
2	MR. GAVENMAN: Objection.	15:55	2	A. Yeah.	15:57
3	THE WITNESS: I don't recall. I think I probably heard from Mike and French, not from Miles.	15:55	4	Q. Let me ask you another question. Have you heard of Robert S. Tucker or Duncan Levin?	15:57
5	BY MR. GREIM:	15:56	5	A. Yes.	15:57
6	Q. When you heard that was happening, what did you do?	15:56	7	Q. Have you met them?	15:58
8	A. I don't remember. I was disappointed.	15:56	8	A. I met with Tucker.	15:58
9	I know that I put lots of hope in this project and I hoped its success. I feel I failed on both sides. I tried to put two sides together, have Miles to pay for this, dig up something that we can use to expose the Communist regime's corruption so that it advances our agenda on anti-CCP, but I failed because I unforeseen the difficulties of finding this information and working together.	15:56	9	Q. Okay. And was he a member of the security team for Guo?	15:58
10	15:56	10	A. At the time.	15:58	
11	15:56	11	MR. GAVENMAN: Objection to form.	15:58	
12	15:56	12	MR. GRENDI: Objection to form.	15:58	
13	15:56	13	BY MR. GREIM:	15:58	
14	15:56	14	Q. Was this in, what, 2017?	15:58	
15	15:56	15	A. Yes.	15:58	
16	15:56	16	Q. Do you know if Guo used Mr. Tucker to do this research?	15:58	
17	15:56	17	A. I didn't.	15:58	
18	Q. But to be fair, you don't know of Mr. Guo being able to do project like this with anyone else, do you?	15:56	18	MR. GAVENMAN: Objection to the form.	15:58
19	15:56	19	BY MR. GREIM:	15:58	
20	15:57	20	Q. Or research similar to this?	15:58	
21	MR. GRENDI: Objection.	15:57			
22	MR. GAVENMAN: Objection to form.	15:57			
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1	THE WITNESS: Can you rephrase that?	15:57	1	A. I didn't.	15:58
2	BY MR. GREIM:	15:57	2	Q. Did there come a time when Tucker was no longer being used as the security person for Guo?	15:58
3	Q. But to be fair, you don't of Mr. Guo doing a project like this with anyone else, do you?	15:57	3	A. I didn't know when they terminate his thing and I just later learned because they changed security. I didn't ask why.	15:58
4	15:57	4	Q. Do you know anything about what Mr. Tucker did for Mr. Guo?	15:58	
5	MR. GRENDI: Objection.	15:57	5	A. I didn't.	15:58
6	MR. GAVENMAN: Objection to form.	15:57	6	MR. GRENDI: Objection.	15:58
7	THE WITNESS: I don't know if he's doing anything or have done anything with other group whatsoever except this one.	15:57	7	MR. GAVENMAN: Objection.	15:58
8	15:57	8	THE WITNESS: Except one thing.	15:58	
9	15:57	9	MR. GAVENMAN: You can answer.	15:58	
10	15:57	10	THE WITNESS: I can answer? Okay. Except one thing. I had a breakfast with Tucker and he told me that during the breakfast that one of his	15:58	
11	Q. On that point, have you ever heard of T&M -- that's the letter T and M --Protection Resources?	15:57	11	15:59	
12	15:57	12	Communist -- we suspect a Communist agent approached	15:59	
13	15:57	13	15:59		
14	A. No. Can you -- who -- is that his security team?	15:57	14	him. We suspect this guy is the smear campaign	15:59
15	15:57	15	15:59		
16	Q. At one time, I believe.	15:57	16	commander in this country. We know he's very close	15:59
17	MR. GRENDI: Objection. I mean, who's	15:57	17	15:59	
18	testifying? Sorry.	15:57	18	to CCP, high ranking, and this guy, his name is Bruno	15:59
19	15:57	19	15:59		
20	MR. GREIM: Yeah. That's right. Let's keep it Q&A. I'm sorry.	15:57	20	Wu.	15:59
21	15:57	21	Bruno Wu approached Tucker, offered him 20	15:59	
22	MR. GRENDI: Thanks.	15:57			
	BY MR. GREIM:	15:57			
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<p>1 million cash to switch to espionage on Miles, and 15:59 2 Tucker asked where you get the cash and he said from 15:59 3 Jack Ma, Alibaba, and then he said they had this 16:00 4 conversation in the open. He videotaped the 16:00 5 conversation. 16:00 6 BY MR. GREIM: 16:00 7 Q. Tucker did? 16:00 8 A. Tucker did. That's the only thing I 16:00 9 remember during the conversation I had with him. 16:00 10 MR. GREIM: All right. Okay. Let's take a 16:00 11 short break. 16:00 12 MR. GRENDI: Yeah. 16:00 13 VIDEOGRAPHER: Going off the record. The 16:00 14 time is 4:02 p.m. 16:00 15 [Recess.] 16:00 16 VIDEOGRAPHER: We are back on the record. 16:18 17 The time is now 4:20 p.m. 16:18 18 BY MR. GREIM: 16:19 19 Q. Mr. Han, you testified earlier that the 16:19 20 projects being discussed at the end of the packet 16:19 21 we've marked as Exhibit 10, that those projects did 16:19 22 not come to fruition? 16:19 </p>	<p>1 answered. 16:20 2 THE WITNESS: I don't remember I saw that. 16:20 3 BY MR. GREIM: 16:20 4 Q. Okay. Would you have introduced 16:20 5 Strategic Vision to the Japan and Taiwan projects if 16:20 6 you thought that Strategic Vision was dishonest? 16:20 7 MR. GAVENMAN: Objection to form. 16:20 8 MR. GRENDI: Objection. 16:20 9 THE WITNESS: I wouldn't. 16:20 10 BY MR. GREIM: 16:20 11 Q. Okay. Let's see. I didn't ask you this 16:20 12 before: Have you ever met Karin Maestrello? 16:20 13 A. Who is that? 16:20 14 Q. Okay. Then I guess -- have you heard 16:20 15 that name before? 16:21 16 A. Carol? 16:21 17 Q. Karin Maestrello. 16:21 18 A. Karin? Karin? You mean Miles' 16:21 19 assistant, Karin? 16:21 20 Q. Yes. 16:21 21 A. Yes. I met. The Italian girl? 16:21 22 Q. The what? 16:21 </p>
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<p>1 MR. GAVENMAN: Objection. 16:19 2 THE WITNESS: With -- 16:19 3 BY MR. GREIM: 16:19 4 Q. With Strategic Vision? 16:19 5 A. No. 16:19 6 Q. And did that include the Taiwan project? 16:19 7 A. Correct. We are still waiting for that 16:19 8 response. 16:19 9 Q. Do you recall the contact in Taiwan 16:19 10 citing the political article as a concern in working 16:19 11 with Strategic Vision? 16:19 12 A. No. What's that? Can you remind me? 16:19 13 Q. Well, are you aware of an article in 16:19 14 "Politico" about -- written about Eastern Profit and 16:19 15 Strategic Vision in this case? 16:19 16 A. I saw that article, but that has nothing 16:19 17 to do with the Taiwan project. 16:20 18 Q. Oh. I understand. It doesn't discuss 16:20 19 the Taiwan project at all, but do you recall that the 16:20 20 contact in the Taiwan project mentioned the 16:20 21 "Politico" article? 16:20 22 MR. GAVENMAN: Objection, form, asked and 16:20 </p>	<p>1 A. Italian girl. 16:21 2 Q. Italian girl, that's right. 16:21 3 A. Yes. I met her. 16:21 4 Q. Do you know what she does for Mr. Guo? 16:21 5 A. She's just -- 16:21 6 MR. GAVENMAN: Objection to form. 16:21 7 MR. GRENDI: Objection to form. 16:21 8 THE WITNESS: My understanding is like an 16:21 9 assistant, office assistant. 16:21 10 BY MR. GREIM: 16:21 11 Q. Do you recall that -- do you recall 16:21 12 hearing that Mr. Guo, himself, told Ms. Wallop and 16:21 13 Mr. Waller that Yvette Wang was still a member of the 16:21 14 Chinese Communist Party? 16:22 15 A. No. I don't recall that. 16:22 16 Q. Do you recall telling Ms. Wallop and Mr. 16:22 17 Waller that Yvette Wang was still a member of the 16:22 18 Chinese Communist Party? 16:22 19 A. I don't. I don't recall that. 16:22 20 Q. Do you think it's possible and just 16:22 21 don't remember? 16:22 22 A. I think it's possible. 16:22 </p>

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1	Q. Is it true that Ms. Wang is actually	16:22	1	MR. GRENDI: Objection to form, relevance.	16:24
2	still a member of the Chinese Communist Party?	16:22	2	Why are we back here? I'm sorry, but I don't know	16:24
3	MR. GAVENMAN: Objection to form.	16:22	3	what this has to do with the case.	16:24
4	MR. GRENDI: Objection to form.	16:22	4	BY MR. GREIM:	16:24
5	THE WITNESS: I don't know, but I think	16:22	5	Q. I want to also ask you now on -- you	16:24
6	likely, but, you know, since she's left with -- she's	16:22	6	testified that Mr. Guo has gone through --	16:24
7	in exile. That changed everything.	16:22	7	A. Different stages.	16:24
8	BY MR. GREIM:	16:22	8	Q. Different stages. Thank you. Would it	16:24
9	Q. But you testified earlier that you don't	16:22	9	surprise you that even in the last month, Mr. Guo has	16:24
10	know the -- you haven't personally investigated the	16:22	10	posted a video praising President Xi as God's gift to	16:25
11	history of her?	16:22	11	China?	16:25
12	A. I didn't.	16:22	12	MR. GRENDI: Objection to the form.	16:25
13	Q. And do you know whether some of her	16:22	13	MR. GAVENMAN: Objection.	16:25
14	family members, immediate family members, are police	16:22	14	THE WITNESS: No. It's not a surprise.	16:25
15	officials in China?	16:23	15	BY MR. GREIM:	16:25
16	MR. GAVENMAN: Objection to form.	16:23	16	Q. Why is that?	16:25
17	MR. GRENDI: Objection.	16:23	17	MR. GAVENMAN: Objection to form.	16:25
18	THE WITNESS: I didn't know that, police	16:23	18	MR. GRENDI: Objection to form.	16:25
19	officers, no, but I remember Miles tell me some of	16:23	19	THE WITNESS: China politics is very	16:25
20	her relatives work in the judicial system.	16:23	20	complicated. There's a -- Chinese Communist regime	16:25
21	BY MR. GREIM:	16:23	21	is not a whole. There are cracks within the system.	16:25
22	Q. Let's see. Earlier, we talked about the	16:23	22	So using that puts a wedge into the members of	16:25
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1	first meeting between or what you believe was the	16:23	1	high-ranking government officials there, CPP	16:25
2	first meeting between Mr. Bannon and Mr. Guo.	16:23	2	officials. It helps. Even President Trump still	16:25
3	A. Yeah.	16:23	3	calls Xi Jinping a great leader of China, great	16:25
4	Q. That was, you said, October 5th?	16:23	4	friend, personal friend. So does he keep political	16:25
5	A. It could be 6th. It could be 5th. I	16:23	5	alliance support for Xi Jinping's policy? I don't	16:25
6	don't remember exactly the date.	16:23	6	think so.	16:25
7	Q. Was that a lunch that you arranged?	16:23	7	So I think it's not black and white about	16:26
8	A. Either lunch or dinner. I didn't	16:23	8	whether he supports Xi Jinping or not. It's what	16:26
9	remember. It's not me arranged. It's Bill Gertz.	16:23	9	specifically you're doing that's disruptive to the	16:26
10	Q. I see. And was -- this was after a	16:23	10	Communist regime that matters more to me.	16:26
11	press conference on the Hudson Institute	16:24	11	BY MR. GREIM:	16:26
12	cancellation?	16:24	12	Q. But as you testified earlier, you don't	16:26
13	MR. GRENDI: Objection, form.	16:24	13	know either way, do you, Mr. Han, about whether Mr.	16:26
14	MR. GAVENMAN: Objection, form.	16:24	14	Guo is, in fact, still negotiating with President Xi?	16:26
15	THE WITNESS: Yes. It was after the	16:24	15	A. I don't know that either.	16:26
16	cancellation, we went to Press Club, and I didn't	16:24	16	MR. GAVENMAN: Object to the form.	16:26
17	remember exact the date, but after that event, we had	16:24	17	MR. GRENDI: Objection to form.	16:26
18	dinner or lunch with Steve Bannon.	16:24	18	MR. GREIM: I'm going to show you what's	16:26
19	BY MR. GREIM:	16:24	19	marked as Exhibit 12, my last exhibit here today.	16:26
20	Q. Now, before Hudson, before the cyber	16:24	20	[Han Exhibit No. 12 was	16:26
21	attack and before Hudson canceled, did you learn that	16:24	21	marked for identification.]	16:26
22	Hudson was probably going to cancel the event anyway?	16:24	22	BY MR. GREIM:	16:26

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1	BY MR. GRENDI:	16:31	1	and most likely kill him in prison.	16:33
2	Q. Good afternoon.	16:31	2	BY MR. GRENDI:	16:33
3	A. Good afternoon.	16:31	3	Q. And what would happen to you if you were	16:33
4	Q. Mr. Han, my name is Zach Grendi. I'm an	16:31	4	to go back to China? Would that be the same result?	16:33
5	attorney for Eastern Profit Corporation, Limited.	16:31	5	MR. GREIM: Same objection.	16:33
6	Thank you for your patience in answering these	16:31	6	THE WITNESS: Very likely. I don't think	16:33
7	questions today and showing up here.	16:31	7	they may not kill me, maybe put me jail for sure.	16:33
8	I just want to ask you about something you	16:31	8	BY MR. GRENDI:	16:33
9	talked about earlier, which was do you recall a time	16:31	9	Q. I think this was clear, but I just want	16:33
10	when French Wallop ever threatened Guo Wengui if	16:31	10	to confirm it. You don't have any formal	16:33
11	there was any kind of lawsuit concerning this	16:31	11	relationship with Mr. Wengui, do you?	16:33
12	research contract?	16:31	12	A. No.	16:33
13	MR. GREIM: Objection, misstates the prior	16:31	13	Q. You don't work for him?	16:33
14	testimony.	16:31	14	A. No.	16:33
15	THE WITNESS: I think there are lots of,	16:31	15	Q. You don't work for one of his companies?	16:33
16	yeah, discussion about that.	16:31	16	A. Not at all.	16:33
17	BY MR. GRENDI:	16:31	17	Q. You haven't received any money from him?	16:33
18	Q. What do you remember about that	16:31	18	A. No.	16:33
19	discussion?	16:31	19	Q. Did French Wallop offer to give you	16:33
20	A. I think, if I recall, they are going to	16:31	20	money for the fact that it got the deposit in	16:33
21	give -- basically, fail if they are going to make a	16:32	21	connection with this research agreement?	16:34
22	huge noise, expose Miles and, you know, try to	16:32	22	MR. GREIM: Objection, vague.	16:34
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1	undermine his political asylum.	16:32	1	THE WITNESS: She might implied. She might	16:34
2	Q. Who is they there? Who are you talking	16:32	2	have implied.	16:34
3	about?	16:32	3	BY MR. GRENDI:	16:34
4	A. I think French and Mike.	16:32	4	Q. How did that happen? How did she imply	16:34
5	Q. So you were at a meeting when that	16:32	5	that you might get money?	16:34
6	happened or you just heard about it? How do you know	16:32	6	A. She said if you need some help for	16:34
7	that that happened?	16:32	7	certain things, you can come to me.	16:34
8	A. We had a meeting. They mentioned to me	16:32	8	Q. And you took that to mean that she was	16:34
9	in my face, in my presence, they are going to make it	16:32	9	offering you financial recompense for setting you up	16:34
10	difficult for Miles.	16:32	10	with Eastern Profit?	16:34
11	Q. So, in other words, if this lawsuit was	16:32	11	A. Maybe.	16:34
12	brought, they were going to try to spike or otherwise	16:32	12	Q. Setting her up with Eastern Profit?	16:34
13	sabotage his political asylum case?	16:32	13	A. Maybe.	16:34
14	MR. GREIM: Objection, leading.	16:32	14	Q. Maybe, okay. Did you accept that offer?	16:34
15	MR. GRENDI: I'm allowed to leading. It's a	16:32	15	A. No.	16:34
16	deposition.	16:32	16	Q. Why not?	16:34
17	THE WITNESS: Yes.	16:32	17	A. I think I have a pure political	16:34
18	BY MR. GRENDI:	16:32	18	motivation come to this -- to facilitate this	16:34
19	Q. Okay. Thank you. What would happen to	16:32	19	contract. So I don't want that, you know, to	16:34
20	Guo Wengui if he went back to China?	16:33	20	jeopardize my reputation, make things complicated.	16:34
21	MR. GREIM: Objection, calls for speculation.	16:33	21	Q. Do you think Strategic Vision has pure	16:34
22	THE WITNESS: They will definitely jail him	16:33	22	political motivations in getting involved with this	16:35
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<p>1 matter? 16:35</p> <p>2 MR. GREIM: Objection, calls for speculation 16:35</p> <p>3 and opinion and also vague. 16:35</p> <p>4 THE WITNESS: I think they have a good 16:35</p> <p>5 intention at the beginning and want to do the right 16:35</p> <p>6 thing, and yeah. I have no doubt, otherwise, I 16:35</p> <p>7 wouldn't introduce them to Miles. 16:35</p> <p>8 BY MR. GRENDI: 16:35</p> <p>9 Q. Do you think they cared about the money? 16:35</p> <p>10 A. They do care about the money, but they 16:35</p> <p>11 do also care about the political agenda. 16:35</p> <p>12 Q. What is Hansheng Wang look like? 16:35</p> <p>13 A. He's a very quiet guy, very reserved, 16:35</p> <p>14 never participated in any of our meetings. 16:35</p> <p>15 Q. Have you ever talked to him? 16:35</p> <p>16 A. Occasionally. 16:35</p> <p>17 Q. If you recall, what did you talk to him about? 16:36</p> <p>18 A. I think it's like what he -- where he 16:36</p> <p>19 come from, where's his native province and what the 16:36</p> <p>20 family were doing. I think he just come from a poor 16:36</p> <p>21 family, like a rural farmer, stuff like that. 16:36</p>	<p>1 -- I'll call them fake dissidents, people are 16:37</p> <p>2 pretending to be dissidents? 16:37</p> <p>3 A. Yes. 16:37</p> <p>4 Q. And what do those fake dissidents do? 16:37</p> <p>5 What is their purpose? 16:37</p> <p>6 A. If we're talking about specifically 16:37</p> <p>7 related to this project -- 16:37</p> <p>8 Q. Sure. 16:37</p> <p>9 A. They're a smear campaign against Miles 16:37</p> <p>10 Kwok. That was number one that those fake dissidents 16:37</p> <p>11 are doing, and in addition to that, there are a lot 16:38</p> <p>12 of people that Miles sued or countersued who are 16:38</p> <p>13 involved in fake political asylum business and they 16:38</p> <p>14 are to survive to make money, like fake persons. 16:38</p> <p>15 We have evidence to show they made -- he 16:38</p> <p>16 helped people to fabricate fake political asylum 16:38</p> <p>17 cases, and there are many more. Like another guy, a 16:38</p> <p>18 lawyer, also does the same thing and then he's also 16:38</p> <p>19 somehow connected with the MSS and the Chinese 16:38</p> <p>20 Embassy. 16:38</p> <p>21 There are so many of them. You know, I think 16:38</p> <p>22 you probably need to talk to the FBI to get this 16:38</p>
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<p>1 York, the embassy here, and money their transferred 16:40 2 from different channels to pay for the legal bill. 16:40</p> <p>3 Q. Are you familiar with a website called 16:40 4 Boxun, B-O-X-U-N, I think? 16:41</p> <p>5 A. Yes. 16:41</p> <p>6 Q. And what does that website do? 16:41 7 A. That website used to be a dissident 16:41 8 Chinese language dissident -- you know, it's like a 16:41 9 free press. It's a free platform. Everybody can put 16:41 10 their stuff in there, but mostly, it's the dissidents 16:41 11 who use that website to access information, post 16:41 12 their grievances or the articles they wrote. 16:41</p> <p>13 Q. So it's sort of open source; anyone can 16:41 14 post on it? 16:41</p> <p>15 A. Correct. 16:41</p> <p>16 Q. Have fake dissidents posted information 16:41 17 on that website? 16:41</p> <p>18 A. I'm sure there are many Chinese 16:41 19 Communists, you know, like sui jin. The water army, 16:41 20 that's the term that posts stuff on that website as 16:41 21 well. 16:41</p> <p>22 Q. So you wouldn't necessarily trust 16:41</p>	<p>1 Q. Do they ever post fake images? 16:43 2 A. Could be. 16:43</p> <p>3 Q. Fake videos? 16:43 4 A. That, I'm not expert on that. So I 16:43 5 can't tell. 16:43</p> <p>6 Q. Would it surprise you if they did? 16:43 7 A. No. I'm not surprised by that. 16:43</p> <p>8 Q. Are you aware that Google recently took 16:43 9 down a number of videos from its platform that were 16:43 10 posted by fake dissidents? 16:43</p> <p>11 A. Yes. 16:43</p> <p>12 Q. Do you know if any of those videos were 16:43 13 critical of Miles Kwok or Guo Wengui? 16:43 14 A. I don't know specific. I suspect, yeah. 16:43</p> <p>15 There might be some. 16:43</p> <p>16 Q. Because Guo Wengui is a real dissident. 16:43 17 Right? 16:43</p> <p>18 A. Guo Wengui, yes. I would characterize 16:43 19 him as a real dissident. 16:44</p> <p>20 Q. And the CCP pretty desperate to get him 16:44 21 back to China and put him in jail? 16:44</p> <p>22 A. Correct. 16:44</p>
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<p>1 anything coming out of Boxun because fake dissidents 16:41 2 post information there? 16:42</p> <p>3 A. No. It depends on the information. 16:42</p> <p>4 Q. Do you happen know where Exhibit 3 and 16:42 5 Exhibit 3 were posted, where they came from? 16:42</p> <p>6 A. No, I don't. Which one? 16:42</p> <p>7 Q. Three. 16:42</p> <p>8 A. Okay. Yeah. 16:42</p> <p>9 Q. Do you know if Boxun was the uploading 16:42 10 entity that put this video out there? 16:42</p> <p>11 A. I didn't know that. 16:42</p> <p>12 Q. Would you trust it if it came from 16:42 13 Boxun? 16:42</p> <p>14 A. It depends on the content. I think it 16:42 15 depends on the information. 16:42</p> <p>16 Q. Well, let me ask you this. 16:42</p> <p>17 A. Not necessarily whether it showed on the 16:42 18 platform. 16:42</p> <p>19 Q. Have fake dissidents posted false 16:42 20 information about other dissidents to disrupt the -- 16:42 21 I'll call it the effort to damage the CCP? 16:42</p> <p>22 A. Yeah. There are some. 16:42</p>	<p>1 Q. In drafting the contract, was there a 16:44 2 concern about Mr. Wengui being identified in 16:44 3 connection with the research agreement? 16:44</p> <p>4 A. I think there was, if I recall 16:44 5 correctly. 16:44</p> <p>6 Q. I'll take you back to the contract. Do 16:44 7 you remember if there was a specific schedule in that 16:44 8 agreement concerning when reports were to be 16:44 9 delivered? 16:44</p> <p>10 A. Yes. There is. 16:44</p> <p>11 Q. Was it -- did it call for reports within 16:44 12 the first week, in the first month of the contract? 16:45</p> <p>13 A. Yeah. I think there is a specific 16:45 14 requirement on the first week. I think it's just 16:45 15 trying to show the progress, we're on the right 16:45 16 track. 16:45</p> <p>17 Q. Well, let's look at the agreement. What 16:45 18 number is that? It's number -- 16:45</p> <p>19 MR. GAVENMAN: Eleven. 16:45</p> <p>20 MR. GRENDI: Eleven. 16:45</p> <p>21 MR. GREIM: Let me just say while we're 16:45 22 pulling it up, the witness was instructed not to 16:45</p>
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<p>1 answer previously about the agreement on the ground 16:45 2 it was calling for a legal conclusion. So I would 16:45 3 hope we'd have consistency. 16:45 4 MR. GAVENMAN: It depends on what the 16:45 5 question is. 16:45 6 MR. GRENDI: I wasn't asking about a legal 16:45 7 opinion on it. 16:45 8 Oh, there's my copy. I'm sorry. 16:45 9 BY MR. GRENDI: 10 Q. Just looking at the second page, it says 16:45 11 the contractor will produce progress reports on this 16:46 12 -- 16:46 13 A. Where is that? 16:46 14 Q. Oh, I'm sorry. The first full paragraph 16:46 15 on the second page. 16:46 16 A. Okay. Okay. Yes. 16:46 17 Q. It says: "The contractor will produce a 16:46 18 progress report on this financial forensic research 16:46 19 each week in the first month, one preliminary report 16:46 20 in the first month and one comprehensive historical 16:46 21 research report within three months." 16:46 22 And then it goes on to talk about update 16:46 </p>	<p>1 reports per individual subject to the client within a 16:47 2 specified timeframe as well as all relevant 16:47 3 supporting data." 16:47 4 Do you see that? 16:47 5 A. Yes. 16:47 6 Q. I'll ask you again did Strategic Vision 16:47 7 deliver weekly reports within the first month of the 16:47 8 agreement? 16:47 9 A. No. 16:47 10 Q. If you look further down the page, it 16:47 11 says: "The contractor will produce social media 16:47 12 research per individual subject to the client on a 16:47 13 weekly basis for the first month and on a monthly 16:47 14 basis thereafter except under circumstances that 16:47 15 require more frequent reporting, paren, weekly or 16:47 16 fortnightly, as the client directs or irregular 16:48 17 emergencies that the contractor may discover." 16:48 18 Do you see that? 16:48 19 A. Um-hum. 16:48 20 Q. Did Strategic Vision deliver weekly 16:48 21 reports during the first month of the agreement 16:48 22 concerning social media research? 16:48 </p>
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<p>1 reports. Do you see that section there? 16:46 2 A. Yes. 16:46 3 Q. Did Strategic Vision deliver financial 16:46 4 forensic research reports each week in the first 16:46 5 month? 16:46 6 MR. GREIM: Objection. Counsel has not 16:46 7 actually read the portion of the contract that he's 16:46 8 purporting to ask about. 16:46 9 MR. GRENDI: What are you talking about? 16:46 10 THE WITNESS: No. 16:46 11 MR. GRENDI: Would you like me to read the 16:46 12 full sentence, Mr. Greim? Is that what you're 16:46 13 getting at? 16:46 14 BY MR. GRENDI: 15 Q. Let me try it again. Looking at this 16:46 16 first full paragraph on the second page, it says: 16:46 17 "The contractor will produce a progress report on 16:46 18 this financial forensic research each week in the 16:47 19 first month, one preliminary report in the first 16:47 20 month, and one comprehensive historical research 16:47 21 report within three months and with update reports 16:47 22 in each following month. The client may require 16:47 </p>	<p>1 MR. GREIM: Objection, foundation. 16:48 2 THE WITNESS: No. 16:48 3 BY MR. GRENDI: 4 Q. And if you look in the middle of the 16:48 5 page there, again, we're on Eastern-000006, the 16:48 6 middle paragraph says: "The contractor will produce 16:48 7 concurrent tracking research per individual subject 16:48 8 to the client on a month basis except in the first 16:48 9 month that weekly reports shall be delivered and 16:48 10 under circumstances that require more frequent 16:48 11 reporting, paren, weekly or fortnightly, end paren, 16:48 12 as the client directs up to a six-month period." 16:48 13 Do you see that? 16:48 14 A. Yes. 16:48 15 Q. Did Strategic Vision deliver weekly 16:49 16 reports on tracking research per individual subject 16:49 17 during the first month of the agreement? 16:49 18 A. No. 16:49 19 Q. Okay. Did there come a time when 16:49 20 Strategic Vision delivered a 60-gigabyte hard drive 16:49 21 of data to Eastern Profit? 16:49 22 A. Yes. 16:49 </p>

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1	Q. And what was on that hard drive?	16:49	1	A. Is this relevant?	16:51
2	A. It's lots of junk information.	16:49	2	Q. Well, that's what I'm going to get at	16:51
3	Q. Was any of that information the kind of	16:49	3	here, because my understanding would probably be that	16:51
4	useful reporting that Eastern Profit would have	16:49	4	you don't want to reveal the name of that entity.	16:51
5	expected under this agreement?	16:49	5	A. No.	16:52
6	MR. GREIM: Objection, foundation, calls for	16:49	6	Q. Okay. Is that because it's normally	16:52
7	opinion.	16:49	7	confidential; you don't disclose the dealings of	16:52
8	THE WITNESS: No.	16:49	8	private investigatory research clients that you're	16:52
9	BY MR. GRENDI:	16:49	9	working with Strategic Vision?	16:52
10	Q. Okay. I believe you testified before	16:49	10	A. Correct.	16:52
11	that you had heard that Team 2 found evidence of --	16:50	11	MR. GRENDI: So, Attorney Greim, we can talk	16:52
12	strike that.	16:50	12	about whether you're going to try to use that in	16:52
13	Did you ever hear that Team 2 of Strategic	16:50	13	damages and we can talk about who this client is and	16:52
14	Vision's team found evidence of Social Security	16:50	14	find out information about it or you can -- we can	16:52
15	number fraud or human trafficking or customs fraud?	16:50	15	lay off on that and maybe talk to your client about	16:52
16	A. Say that again.	16:50	16	it.	16:52
17	Q. Sorry. Did there ever come a time when	16:50	17	MR. GREIM: Yeah. Let's just -- let's take	16:52
18	you heard from Strategic Vision that its second team	16:50	18	one minute.	16:52
19	-- they call it Team 2 -- had found evidence of	16:50	19	MR. GRENDI: Sure. Off the record.	16:52
20	Social Security fraud, human trafficking, or customs	16:50	20	VIDEOGRAPHER: Going off the record. The	16:52
21	fraud concerning the subjects of the research	16:50	21	time is now 4:54 p.m.	16:52
22	agreement?	16:50	22	[Mr. Greim confers with Ms. Wallop and Mr.	16:52
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1	A. Yes, but I don't hear the Team 2, that	16:50	1	Waller.]	16:54
2	term. I was not familiar with the Team 2.	16:50	2	VIDEOGRAPHER: We are back on the record.	16:54
3	Q. Let's just say Strategic Vision. Did	16:51	3	The time is now 4:57 p.m.	16:55
4	Strategic Vision tell you it had found that kind of	16:51	4	BY MR. GRENDI:	16:55
5	information?	16:51	5	Q. So, Mr. Han, if you would please	16:55
6	A. Yes.	16:51	6	identify the client or potential client from Taiwan	16:55
7	Q. They did ever give you any documents to	16:51	7	that you spoke of politically concerning a newspaper	16:55
8	prove that or show that that was the case?	16:51	8	article in "Politico".	16:55
9	A. No.	16:51	9	A. There is a -- I saw that article. I	16:55
10	Q. No. Okay. And the whole point of this	16:51	10	didn't know what it referred to. They specifically	16:55
11	agreement was to get that, like you said, the	16:51	11	talked about the Taiwan project?	16:55
12	concrete evidence that there was corruption in the	16:51	12	Q. No, no. I'm sorry. You know what?	16:55
13	CCP. Right?	16:51	13	Let's strike that question. I'll start over.	16:55
14	A. Correct.	16:51	14	what is the name of the entity you and	16:55
15	Q. But that was never delivered under this	16:51	15	Strategic Vision have been working on that comes from	16:55
16	agreement, was it?	16:51	16	Taiwan? Who is that?	16:55
17	A. No.	16:51	17	A. There are several. The Taiwan National	16:55
18	Q. I'll ask about this one, but I think	16:51	18	Security Council and Taiwan DPP, which is the ruling	16:55
19	we're going to have to eventually go off the record	16:51	19	party, and the embassy here.	16:55
20	on it. What is the name of project in Taiwan that	16:51	20	Q. And is Strategic Vision trying to	16:55
21	you were talking about with Attorney Greim just	16:51	21	solicit business from those entities?	16:55
22	before the break?	16:51	22	A. Correct.	16:56
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1	Q. And have they told you -- well have they	16:56	1	dissidents are actually fake dissidents working for	16:58
2	accepted an offer of services from Strategic Vision?	16:56	2	the CCP?	16:58
3	A. Not yet.	16:56	3	A. Correct.	16:58
4	Q. So that could happen? They are working	16:56	4	Q. So there's a lot of blurred lines in	16:58
5	on it?	16:56	5	this whole mixup?	16:58
6	A. Yes.	16:56	6	A. Yeah. The politics of China is so	16:58
7	Q. Have those entities said they won't do	16:56	7	complicated. It's not like --	16:58
8	business with Strategic Vision because Strategic	16:56	8	Q. So just because you read something	16:58
9	Vision did business with Eastern Profit?	16:56	9	someone says in one context doesn't mean that's what	16:58
10	A. No.	16:56	10	they actually believe; they might be, you know,	16:58
11	Q. Did those entities say, you know, I've	16:56	11	playing both sides or --	16:58
12	seen you mixed up in articles with Guo Wengui	16:56	12	A. Correct.	16:58
13	mentioned; we don't do business with anyone who does	16:56	13	Q. -- working on different angles based on	16:58
14	business with them?	16:56	14	who their real alliance is with?	16:58
15	A. No.	16:56	15	A. Yes.	16:58
16	Q. Okay. Let me just go through quickly.	16:56	16	MR. GRENDI: Thank you very much for your	16:58
17	A. So this will be confidential, what I	16:57	17	time.	16:58
18	just discussed?	16:57	18	THE WITNESS: You're welcome.	16:58
19	MR. GREIM: Yes. We are going to be marking	16:57	19	MR. GREIM: I have a couple of questions on	16:58
20	that confidential. In fact, the entire transcript	16:57	20	redirect for you now.	16:58
21	will be confidential for 21 days after we receive a	16:57	21	MR. GRENDI: Re-redirect.	16:58
22	final version. After that point, each party will	16:57	22	FURTHER EXAMINATION BY COUNSEL FOR	16:58
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1	have 21 days to designate confidential information.	16:57	1	DEFENDANT/COUNTERCLAIM PLAINTIFF	16:58
2	We intend to designate that information confidential,	16:57	2	BY MR. GREIM:	16:58
3	which means that no one here can disclose it for any	16:57	3	Q. You testified or you were allowed to	16:58
4	purposes outside the case. CCP party members or not	16:57	4	answer a question. You said that the CCP is	16:58
5	for whatever reason, nobody can disclose it.	16:57	5	desperate to get Guo back to China. Do you remember	16:58
6	BY MR. GRENDI:	16:57	6	saying that?	16:59
7	Q. Let me ask one last question. Then I	16:57	7	A. Yes.	16:59
8	think I'll be done.	16:57	8	Q. Do you have any personal knowledge of	16:59
9	A. I appreciate that.	16:57	9	that?	16:59
10	Q. Sure. Well, one last, I should say,	16:57	10	A. Yes, I do.	16:59
11	batch of questions. Are all members of the CCP	16:57	11	Q. What is that knowledge?	16:59
12	corrupt?	16:57	12	A. The knowledge from, you know, like there	16:59
13	A. I think almost all of them are corrupt.	16:57	13	are some people that I think they are representing	16:59
14	There is systematic corruption.	16:58	14	the Chinese Government, approached me. They asked me	16:59
15	Q. Have you ever had occasion to work with	16:58	15	specifically not to help Miles and not only not to	16:59
16	a dissident who was working within the CCP to kind of	16:58	16	help Miles, but also convince Steve Bannon not to	16:59
17	be an inside person?	16:58	17	help Miles. This is most important to them and, of	16:59
18	A. Yes.	16:58	18	course, I said, you know, no.	16:59
19	Q. So some people in the CCP are actually	16:58	19	Q. How do you know those people are with	16:59
20	working with dissidents to try to undermine the CCP?	16:58	20	the Chinese Government?	16:59
21	A. Of course.	16:58	21	A. They come from -- they said that they're	16:59
22	Q. And, as we discussed before, some	16:58	22	representing a certain sect, certain -- they are	17:00
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<p>1 passing the message of the government to us, to my 17:00 2 organization and myself. 17:00 3 Q. Other than that, do you have any other 17:00 4 basis to claim personal knowledge? 17:00 5 A. About? 17:00 6 Q. Your claim that the CCP is desperate to 17:00 7 get Guo back to China? 17:00 8 A. I saw the smear campaign of Bruno Wu. I 17:00 9 saw Roger Stone. I saw another guy that worked with 17:00 10 Roger Stone. I saw the Chinese dissidents that 17:00 11 suddenly all turned against Miles. 17:00 12 To me, to my longtime observation of Communist 17:00 13 Party, it is an organized campaign to get him back, 17:01 14 and so -- I'll stop there. 17:01 15 Q. You testified earlier, you answered a 17:01 16 series of questions about what weekly records 17:01 17 Strategic Vision had given to -- I think the question 17:01 18 was phrased as to Eastern Profit during January. Do 17:01 19 you recall that testimony a few moments ago? 17:01 20 A. Say that again, please. 17:01 21 Q. Yeah. A few moments ago, you testified, 17:01 22 you answered a series of questions -- 17:01 </p>	<p>1 BY MR. GREIM: 17:02 2 Q. So it was in the month of February that 17:02 3 Strategic Vision began to report to you again instead 17:02 4 of Ms. Wang? 17:02 5 A. That's not correct. 17:02 6 MR. GAVENMAN: Objection. 17:02 7 MR. GRENDI: Objection to the form. 17:02 8 BY MR. GREIM: 17:02 9 Q. Tell me where I got that wrong. 17:02 10 A. Because I think you -- when they first 17:02 11 deliver that USB, I think I was aware of that. I 17:03 12 don't know how maybe French and Mike approached me, 17:03 13 and I saw the information in that USB. So I know 17:03 14 that is not the information requested in the 17:03 15 contract. 17:03 16 Q. Now, did you see the decrypted 17:03 17 information? 17:03 18 A. I see -- 17:03 19 MR. GRENDI: Objection to the form. 17:03 20 THE WITNESS: -- some. Yeah. Mike showed me 17:03 21 the computer. 17:03 22 BY MR. GREIM: 17:03 </p>
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<p>1 A. Yes. 17:01 2 Q. -- about what reports Strategic Vision 17:01 3 had given to Eastern Profit. 17:01 4 A. Yeah. 17:01 5 Q. Now, do you -- you were not responsible 17:01 6 for handling the performance of the agreement for 17:02 7 most of the month of January; isn't that right? 17:02 8 MR. GRENDI: Objection, form. 17:02 9 MR. GAVENMAN: Objection. 17:02 10 THE WITNESS: Right. 17:02 11 BY MR. GREIM: 17:02 12 Q. And do you -- are you aware of all of 17:02 13 the conversations Ms. Wang had with Strategic Vision 17:02 14 about what it was supposed to and not supposed to 17:02 15 turn in as the contract unfolded? 17:02 16 A. I don't. 17:02 17 Q. So when you began to enter the picture 17:02 18 again was in February; is that correct? 17:02 19 MR. GRENDI: Objection to form. 17:02 20 MR. GAVENMAN: Objection to form. 17:02 21 MR. GREIM: Let me ask a more -- 17:02 22 MR. GRENDI: Misstates prior testimony. 17:02 </p>	<p>1 Q. So did you see all the information on 17:03 2 the drive? 17:03 3 A. Not all of it. 17:03 4 Q. Were you aware of what Mike had told 17:03 5 Eastern Profit to expect about what was going to be 17:03 6 on the drive? 17:03 7 A. He mentioned to me. 17:03 8 Q. What did he say? 17:03 9 A. He said, basically, the team needs to w 17:03 10 build the relationship to -- from outside and figure 17:03 11 out, you know, what they're really looking for, their 17:04 12 best way, you know, to get the information. I think 17:04 13 I expressed my dissatisfaction about that approach 17:04 14 because the information is -- the instruction is so 17:04 15 clear. The list is so clear. 17:04 16 So they shouldn't be going around, collecting 17:04 17 this useless information. It's a waste of time. I 17:04 18 knew it's going to be bad with Miles because I know 17:04 19 what he was expecting. That's why I made that clear 17:04 20 to Mike and French, and then Miles insists on first 17:04 21 week delivery. So Mike made a special trip to New 17:04 22 York, delivered that. We discussed about whether he 17:04 </p>

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<p>1 should go or shouldn't go. I remember that part. 17:04</p> <p>2 Q. Now, do you know whether Strategic 17:05</p> <p>3 Vision was subsequently instructed not to provide any 17:05</p> <p>4 social media research because Guo considered it a 17:05</p> <p>5 waste? 17:05</p> <p>6 A. That, I don't know. 17:05</p> <p>7 Q. Okay. And that was one of the three 17:05</p> <p>8 categories of information. Correct? 17:05</p> <p>9 A. Correct. 17:05</p> <p>10 MR. GAVENMAN: Objection, form. 17:05</p> <p>11 MR. GRENDI: Objection to form. 17:05</p> <p>12 BY MR. GREIM: 17:05</p> <p>13 Q. Do you recall that Strategic Vision told 17:05</p> <p>14 you that it believed that the initial reports were to 17:05</p> <p>15 be progress reports and would not contain all the 17:05</p> <p>16 data that would be available later in the project? 17:05</p> <p>17 MR. GRENDI: Objection to the form. 17:05</p> <p>18 MR. GAVENMAN: Objection. 17:05</p> <p>19 THE WITNESS: Yes. 17:05</p> <p>20 BY MR. GREIM: 17:05</p> <p>21 Q. Do you recall that -- earlier, you 17:05</p> <p>22 testified that when Strategic Vision reported the 17:06</p>	<p>1 A. My guidance regarding the protection of 17:07</p> <p>2 the person? 17:07</p> <p>3 Q. No. I'm sorry. The guidance on how to 17:07</p> <p>4 convey the information about the fraud that they had 17:07</p> <p>5 uncovered if they couldn't provide it to you in 17:07</p> <p>6 document form. 17:07</p> <p>7 A. I don't recall specific, but I think we 17:07</p> <p>8 discussed how we can discover, find out, the 17:07</p> <p>9 information we can use or we can talk to the 17:07</p> <p>10 government about it, and with this restricted person, 17:07</p> <p>11 I think I approached the FBI, reported to them. 17:07</p> <p>12 This is also French's suggestion, that maybe 17:07</p> <p>13 the Clinton Administration did something or Obama 17:07</p> <p>14 Administration did something to protect those guys. 17:08</p> <p>15 So we needed to have the American Government look 17:08</p> <p>16 into it. 17:08</p> <p>17 So I did talk to, you know, FBI about them and 17:08</p> <p>18 it doesn't come up with anything. I think the FBI 17:08</p> <p>19 contacted them for further discussion. I don't know 17:08</p> <p>20 what's going on after that. 17:08</p> <p>21 Q. And by that time, the contract had been 17:08</p> <p>22 terminated. Right? 17:08</p>
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<p>1 results from what you now know as Team 2 -- 17:06</p> <p>2 A. Right. 17:06</p> <p>3 Q. -- they did not give you documents when 17:06</p> <p>4 they told you about the human trafficking and Social 17:06</p> <p>5 Security fraud? 17:06</p> <p>6 A. Right. 17:06</p> <p>7 Q. But do you recall that they also were 17:06</p> <p>8 concerned that providing the documents to you might 17:06</p> <p>9 be a crime because of what they learned about the 17:06</p> <p>10 records protected issue? 17:06</p> <p>11 MR. GRENDI: Objection. 17:06</p> <p>12 MR. GAVENMAN: Objection to form. 17:06</p> <p>13 THE WITNESS: That's what French told me, and 17:06</p> <p>14 I don't know who is on that list. There definitely 17:06</p> <p>15 is some other people that is not on that list and I 17:06</p> <p>16 haven't seen any document presented to me. 17:06</p> <p>17 BY MR. GREIM: 17:06</p> <p>18 Q. Do you recall that they asked you for 17:06</p> <p>19 guidance on how they can convey that information to 17:06</p> <p>20 you? 17:06</p> <p>21 A. Yes. 17:06</p> <p>22 Q. And did you give any guidance? 17:06</p>	<p>1 A. Correct. 17:08</p> <p>2 Q. When did you contact the FBI about the 17:08</p> <p>3 information that Strategic Vision had given you? 17:08</p> <p>4 A. I think right after we discussed about 17:08</p> <p>5 the five persons. I don't remember exactly the date. 17:08</p> <p>6 Q. Sometime in mid-February? 17:08</p> <p>7 A. Could be. 17:08</p> <p>8 Q. Was this the FBI in New York or D.C.? 17:09</p> <p>9 A. In New York. 17:09</p> <p>10 MR. GREIM: All right. I don't have any 17:09</p> <p>11 further questions for you, sir. Thank you for a very 17:09</p> <p>12 -- well, maybe you've got recross. 17:09</p> <p>13 MR. GRENDI: No. 17:09</p> <p>14 MR. GREIM: No? 17:09</p> <p>15 MR. GRENDI: No. I think we're good. Thank 17:09</p> <p>16 you very much for your time, sir. 17:09</p> <p>17 THE WITNESS: Sure. Thank you. I'm sorry 17:09</p> <p>18 about this unfortunate event, but as I said, 17:09</p> <p>19 everybody come in with a good intention and I think 17:09</p> <p>20 it's a pure, you know, commercial case, shouldn't be 17:09</p> <p>21 politicized. That's all I want to say for the 17:09</p> <p>22 record. 17:09</p>

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1	MR. GRENDI: Thank you.	17:09	1	CERTIFICATE OF NOTARY PUBLIC
2	MR. GREIM: Thank you.	17:09	2	I, CATHERINE B. CRUMP, the officer before
3	VIDEOGRAPHER: This concludes today's video	17:09	3	whom the foregoing deposition was taken, do hereby
4	deposition of Lianchao Han. This is Disk 3 of 3,	17:09	4	testify that the witness whose testimony appears in
5	going off the record. The time is 5:11 p.m.	17:09	5	the foregoing deposition was duly sworn by me; that
6	[Whereupon, at 5:11 p.m., the deposition		6	the testimony of said witness was taken by me
7	concluded.]		7	stenographically and thereafter reduced to
8	[Signature not waived.]		8	typewriting under my direction; that said deposition
9			9	is a true record of the testimony given by said
10			10	witness; that I am neither counsel for, related to,
11			11	nor employed by any of the parties to the action in
12			12	which this deposition was taken; and further, that I
13			13	am not a relative or employee of any attorney or
14			14	counsel employed by the parties hereto nor
15			15	financially or otherwise interested in the outcome of
16			16	the action.
17			17	_____
18			18	**Signature <u>CATHERINE B. CRUMP</u>
19			19	Requested** Notary Public in and for the
20			20	District of Columbia
21			21	My Commission Expires: October 31, 2022
22				

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1	CERTIFICATE OF DEONENT		
2			
3	I have read the foregoing 294 pages which		
4	contain the correct transcript of the answers made by		
5	me to the questions therein recorded.		
6			
7			
8			
9	<u>Lianchao Han</u>		
10			
11	---		
12			
13	Subscribed and sworn to before me this		
14	____ day of _____, 2019.		
15			
16			
17			
18			
19			
20	Notary Public in and for		
21			
22	My Commission Expires:		

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Lianchao Han - Confidential
August 28, 2019

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